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ABSTRACT

This guide is intended to assist institutions of higher education as they evaluate the efficiency and effectiveness of their administration of financial aid programs and compliance with federal laws and regulations, especially Title IV of the Higher Education Act. The guide goes beyond federal requirements to include other good administrative practices that can minimize incidents of misrepresentation and provide a clear audit trail for every transaction. The question-and-answer format is supported by citations to the appropriate legislation or regulation. Part 1 covers general institutional responsibilities, including policies and procedures, student consumer information, and good practices. Part 2 covers the administration of specific federal programs such as the Pell Grant Program, the Perkins Loan Program, the Supplemental Educational Opportunity Grant Program, the Family Education Loan Program, the William D. Ford Direct Loan Program, health professions, scholarships for disadvantaged students, and Bureau of Indian Affairs programs. Part 3 addresses the administration of financial aid, including general fiscal administration, drawing down funds, and cash management. Five appendices comprise Part 4, and include relevant legislative texts and a list of frequently used abbreviations. (DB)

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ED 423 755

Self-Evaluation Guide

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1997-98 and 1998-99

Fourteenth Edition

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Self-Evaluation Guide

for
Institutional Participation

in Title IV and Other Federal Programs

Fourteenth Edition

1997-98 and 1998-99

N·A·S·F·A·A

The following disclosure is required under contract #PM95009001.

This publication contains materials related to Federal Title IV student aid programs. While NASFAA believes that the information contained herein is accurate and factual, this publication has not been reviewed or approved by the U.S. Department of Education.

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NATIONAL ASSOCIATION OF STUDENT FINANCIAL AID ADMINISTRATORS

1920 L Street, N.W., Suite 200, Washington, DC 20036

NASFAA is a non-profit corporation of institutions of postsecondary education and other individuals, agencies, and students, who are interested in promoting the effective administration of student financial aid in the United States.

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Foreword

As the complexity of financial aid programs has increased, so too has the demand for financial assistance as students face ever increasing costs of education. The importance of federal and state-sponsored student aid in concert with an institution's own programs must be recognized. Further, we must not underestimate the challenges inherent in administering these programs in an environment where change is the norm.

One of NASFAA's primary objectives is to assist aid administrators in developing efficient ways to manage the complex financial aid operation. In an effort to help institutions improve the operation of student assistance programs, the first edition of the *Institutional Guide for Financial Aid Self-Evaluation* was developed by the NASFAA Committee on Program Review and distributed to all NASFAA members in the fall of 1978.

Over the years, the *Guide* has been modified. A separate fiscal office section was developed and new sections were added to encompass changed, expanded, or new student aid programs. The Fourteenth Edition continues to emphasize the fact that proper administration of federal financial aid programs is an institution-wide effort and affects many aspects of institutional life beyond any one office or division.

The Fourteenth Edition also serves as an evaluation tool for the past year (1997-98) and as a means of checking policy and procedural changes for the year just beginning (1998-99). NASFAA hopes that this combined evaluation tool will be a valuable exercise for the time invested in completing it. NASFAA is aware that reauthorization could impact the information for the 1998-99 year and will make every effort to notify institutions of changes that will affect information contained in this publication.

To facilitate its use, the *Guide* is once again being provided in loose-leaf format and is designed to fit in a 1-1/2" to 2" binder. This format was suggested by users who found that the breadth and scope of the *Self-Evaluation Guide* required that it be completed by more than one person. The loose-leaf format makes it easy for users to divide the document into sections and distribute those sections to the appropriate school official for completion. NASFAA welcomes any additional suggestions for improvement and has included an evaluation form with this publication to encourage comment.

While the *Guide* does not define every program regulation and legislative statute governing these programs, it does attempt to describe the majority of requirements as well as the principles of good practice. Citations to regulations or law appear throughout, and complete lists of statutes and regulations pertaining to federal student financial aid programs are included in the appendices.

The Department of Education has listed the *Self-Evaluation Guide* as a general reference document in its Audit Guides. We would point out, however, that the *Guide* has not been submitted to the U.S. Department of Education for review or endorsement, and while completion of the *Guide* would constitute a good practice, it is not currently a requirement for federal program review or audit purposes.

July 1998

Instructions for Use of the Self-Evaluation Guide

Purpose and Applicability

The *Self-Evaluation Guide* has been designed as an in-house tool to help institutions evaluate the efficiency and effectiveness of their administration of financial aid programs and compliance with federal laws and regulations.

An effort has been made to include all questions which would normally be relevant in an official program review at any type of postsecondary institution. The *Self-Evaluation Guide* goes beyond those requirements, however, to include other recommended good administrative practices, with a view to minimizing incidents of misrepresentation and providing a clear audit trail for every transaction. Although the *Self-Evaluation Guide* has been designed for use by all institutions participating in the financial aid programs, it is by no means all-inclusive for all types of institutions; nor do recommended good practices necessarily apply to all institutions. It is incumbent on all aid administrators to be familiar with the regulations and good practices relevant to their particular institution.

How to Complete the *Self-Evaluation Guide*

The *Self-Evaluation Guide* is constructed in a question-and-answer format. Generally, a "yes" response to a question indicates the institution is meeting the requirement or standard presented; a "no" response means some follow-up action is desirable or necessary. Any variation between a clear "yes" or "no" answer can be indicated by positioning the check mark to the left or right, or by using a percentage figure if desired. This would indicate that the institution is in partial agreement, but some change or improvement may be needed. Whenever questions are not applicable to the institution (for example, the institution may not be participating in all federal or state programs) the "n/a" should be checked. Space for comments or an explanation of certain responses has been left at the end of each section.

All institutions participating in any Title IV program should complete Part 1 and the General Provisions section of Part 2. Institutions participating in any of the campus-based programs should complete Section III (Campus-based Programs, Common Provisions) as well as the sections dealing with the individual programs in which the institution participates.

The information contained in the *Self-Evaluation Guide* reflects NASFAA's understanding of the laws and regulations applicable to award years 1997-98 and 1998-99. Requirements that pertain to only one of the two award years covered by this edition of the *Self-Evaluation Guide* are designated by a symbol:

● means the requirement pertains to 1997-98 but not to 1998-99. The requirement might have been either deleted or changed substantively.

✦ means the requirement pertains only to 1998-99. The requirement may be new, or may be a revised version of a previous rule.

For convenience, these symbols are summarized in the footer of each page. When no bullet or diamond appears next to the requirement, it pertains to both 1997-98 and 1998-99.

‣ is used as a regular bullet to list items.

References

References to current regulations or, where final regulations have not yet been issued, to statute, are included for each program in the left hand column. Occasionally, references such as Dear Colleague Letters, the *Federal Student Financial Aid Handbook* issued by the Department of Education, or *Student Financial Aid Guidelines* issued by the Department of Health and Human Services, are included to clarify provisions of law not codified in regulation, as well as policy interpretations and other guidance.

If the individual completing a section does not understand a particular question or is not familiar with the requirement, the references often provide further detail.

Regulatory references appear in the form of abbreviated citations. In the Title IV programs, regulatory references are to Title 34 of the Code of Federal Regulations, formally cited 34 CFR. For example, a specific reference would formally read 34 CFR 690.2, meaning Title 34, Part 690, Section 690.2, where "Part" refers to the regulations pertaining to a specific program. We have used only the section references, as in the example above, 690.2. Several citations are listed if the item is included in more than one section of the regulations. You will also note that the different sections generally pertain to different programs: Part 673 pertains to the Campus-based Common Provisions; Part 676 to the FSEOG Program; Part 675 to the FWS Program; Part 690 to the Federal Pell Grant Program; Part 674 to the Federal Perkins Loan Program (NDSL); Part 682 to the Federal Family Education Loan programs; and Part 685 to the Direct Loan Program. General Provisions regulations, which govern all Title IV programs, are contained in Part 668.

Other abbreviations are used. Although Appendix E lists a multitude of abbreviations used within the financial aid field, users of the *Self-Evaluation Guide* will run into the following ones in the reference column and in the questions themselves:

FSFA Handbook:	Federal Student Financial Aid Handbook
DCL:	Dear Colleague Letter. The first part of a DCL designation alludes to the program it affects: CB means campus-based; P means Federal Pell Grant; DLB means Direct Loan; S means a letter pertaining to the FFEL program sent to schools; GEN means the letter concerns the General Provisions.
ED, USDE, or USED:	U.S. Department of Education

Who Should Complete the Guide

The *Guide* should be completed by the financial aid administrator in cooperation with the fiscal officer responsible for the fiscal management of the federal financial aid funds and any other institutional official whose duties touch on compliance with federal financial aid regulations. The loose-leaf construction and page numbering format (each section is separately numbered, beginning with page 1) are intended to facilitate dividing this evaluation task among all concerned individuals. NASFAA recommends that the financial aid administrator share the results of this self-evaluation with his/her supervisor and/or the chief executive of the institution. A space for identifying the person responsible for the review of each section and the date reviewed has been preprinted in the upper right hand corner of the first page of each section. A space for indicating the office responsible for carrying out specific tasks or functions appears to the right of each question.

Effective Use of the *Self-Evaluation Guide*

If fully utilized, the *Self-Evaluation Guide* is a valuable tool. For example, the *Guide* may be used to:

1. Assist the financial aid administrator in conveying to the administration (or other target group) the magnitude and complexity of the financial aid operation.

2. Document the need for an operating budget, staffing, and physical accommodations commensurate with the size and scope of the institution's financial aid programs.

3. Develop a profile of the financial aid operation for affirmation and/or revision of policies, office procedures, and administrative controls.

4. Train new staff and enhance the skills and knowledge of current staff.

5. Enable the institution to prepare for audits and program reviews.

6. Assist in the preparation of financial aid and fiscal reports.

7. Serve as an outline for periodic checks of the financial aid operation to determine progress being made in plans for improvement.

8. Provide an outline of information to be included in the financial aid staff manual or institutional policies and procedures.

Where to Get Copies of Regulations and Public Laws

Information regarding availability and cost of ordering copies of Public Laws or back issues of the Federal Register may be obtained from the Superintendent of Documents, U.S. Government Printing Office, Publications Department, Washington, D.C. 29402. Most larger libraries will have up-to-date copies of the Code of Federal Regulations and the United States Code available for reference. In addition, copies of the Department of Education's compilation of the regulations, Dear Colleague Letters, handbooks, and guides can be obtained by calling 1-800-4-FEDAID, or by accessing the NASFAA web site at www.nasfaa.org or the Department's Information for Financial Aid Professionals website at www.ifap.ed.gov.

Evaluating the *Self-Evaluation Guide*

NASFAA is committed to providing resource materials useful to the practicing aid administrator and actively solicits your suggestions for improvements to this publication. We would appreciate your completing the enclosed Evaluation Form to assist us in improving future editions of the *Guide*. If you would like to offer further comments or suggestions, please send them to Connie McCormick, Director of Training and Technical Assistance.

III. Evaluate the effectiveness of each part of the Self-Evaluation Guide (continued).

C. Part 3: Administration of Financial Aid: Fiscal Office

1. Very effective
2. Moderately effective
3. Somewhat effective
4. Not at all effective

If you circled 3 or 4, what suggestions do you have for improving the effectiveness of Part 3?

_____

_____

D. Appendices

1. Very effective
2. Moderately effective
3. Somewhat effective
4. Not at all effective

If you circled 3 or 4, what suggestions do you have for improving the Appendices?

_____

_____

IV. Evaluate the overall benefits of completing the Self-Evaluation Guide (circle your responses).

A. How helpful was completion of the Guide in the administration of aid programs at your institution?

1. Very helpful
2. Moderately helpful
3. Somewhat helpful
4. Not at all helpful

If you circled 3 or 4, what suggestions do you have for improving the Guide to make it more helpful?

_____

_____

B. How time consuming was completion of the Guide?

1. Not at all time consuming
2. Somewhat time consuming
3. Moderately time consuming
4. Very time consuming

If you circled 4, what suggestions do you have for making the Guide less time consuming?

_____

_____

C. Given the amount of time it took your institution to complete the Guide, how beneficial was the exercise?

1. Very beneficial
2. Moderately beneficial
3. Somewhat beneficial
4. Not at all beneficial

D. Once completed, you will share the results of the Self--Evaluation Guide with the following **(check all that apply)**:

___ Financial Aid staff

___ Fiscal Office staff

___ Senior management to discuss implementation and recommendations

___ Other offices as appropriate (please list):

_____

_____

_____

_____

_____

_____

Please list general comments or suggestions for improvement of the Self-Evaluation Guide.

_____

_____

_____

_____

Thank you for taking the time to complete this evaluation.
Your comments and suggestions will be used to improve subsequent editions of the Self-Evaluation Guide.

Self-Evaluation Guide
Evaluation Form

Please take a few moments to complete this evaluation form. Return it along with any comments or suggestions to:

NASFAA
Training and Technical Assistance Division
1920 L Street, NW, Suite 200
Washington, D.C. 20036-5020
FAX: (202) 785-1487

I. Evaluate the format of the Self-Evaluation Guide (circle your responses).

A. Overall, how easy to work with was the 4-column format of the Guide?

1. Very easy to work with
2. Somewhat easy to work with
3. Somewhat difficult to work with
4. Very difficult to work with

If you circled 3 or 4, what suggestions do you have for making the format easier to work with?

_____

_____

B. Overall, how would you rate the organization and structure of the Guide?

1. Very good
2. Good
3. Fair
4. Poor

If you circled 3 or 4, what suggestions do you have for improving the organization?

_____

_____

II. Evaluate the content of the Self-Evaluation Guide (circle your responses).

A. How useful was the content of the Guide?

1. Very useful
2. Moderately useful
3. Somewhat useful
4. Not at all useful

If you circled 3 or 4, what suggestions do you have for improving the content?

_____

_____

_____

_____

B. How useful were the response options (Yes, No, N/A) in evaluating your and your institution's responsibilities, operations, and programs?

1. Very useful
2. Moderately useful
3. Somewhat useful
4. Not at all useful

If you circled 3 or 4, what suggestions do you have for improving the response options?

_____

_____

C. How helpful were the statements in the "Good Practice" sections for your office evaluation?

1. Very helpful
2. Moderately helpful
3. Somewhat helpful
4. Not at all helpful

If you circled 3 or 4, what suggestions do you have for improving the statements of Good Practice?

_____

_____

_____

III. Evaluate the effectiveness of each part of the Self-Evaluation Guide (circle your responses).

A. Part 1: Institutional Responsibilities

1. Very effective
2. Moderately effective
3. Somewhat effective
4. Not at all effective

If you circled 3 or 4, what suggestions do you have for improving the effectiveness of Part 1?

_____

_____

B. Part 2: Administration of Federal Programs

1. Very effective
2. Moderately effective
3. Somewhat effective
4. Not at all effective

If you circled 3 or 4, what suggestions do you have for improving the effectiveness of Part 2?

_____

_____

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Self-Evaluation Guide for Institutional Participation in Title IV and Other Federal Programs

Part 1: Institutional Responsibilities

I. Institutional Policies and Procedures

Prepared by_____ Date_____
Reviewed by_____ Date_____

Institutional Eligibility

Reference	Question	Responsible Office	Response
600.4(a)(5) 600.5(a)(6) 600.6(a)(5)	A. Has the institution maintained the proper accreditation or preaccreditation from a nationally recognized accrediting agency, or approval from a recognized state agency, according to its institutional classification?	_____	yes___no___
600.11(a)	1. If the institution is changing accrediting agencies, has the institution provided ED with appropriate information and reasonable explanations?	_____	yes___no___
600.11(b)	2. If the institution uses multiple accrediting agencies, has the institution provided explanations to ED and to each accrediting agency, and designated which agency should be used to determine eligibility?	_____	yes___no___ n/a___
600.5(a)(8) 600.5(d)	B. If a proprietary institution, does the institution ensure that no more than 85% of its revenues are derived from Title IV program funds?	_____	yes___no___ n/a___
668.23(d)(4)	1. Does the institution disclose, in a footnote to its financial audit, the percentage of revenue derived from Title IV program funds?	_____	yes___no___ n/a___
600.4(a)(2) 600.5(a)(3) 600.6(a)(2)	C. Does the institution admit as regular students (i.e., students seeking the institution's degree, certificate, or other recognized educational credential) only individuals who have a high school diploma or its recognized equivalent or are beyond the age of compulsory attendance?	_____	yes___no___
600.7(a)(1)(iv) 600.7(e)	1. Do students who do not have a high school diploma or recognized equivalent constitute	_____	yes___no___ n/a___

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Items marked ✦ are effective beginning 1998-99.

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Reference	Question	Responsible Office	Response
	less than 50% of regular students? (*Not applicable if institution provides 2-year associate or 4-year bachelor's program, or if waived by ED.*)		
668.14(b)(13) DCL GEN-89-58 DCL GEN-90-33	2. Does the institution make available to Title IV recipients admitted without a high school diploma or its recognized equivalent a program that is proven successful in assisting students in obtaining a recognized equivalent?	_____	yes___ no___ n/a___
600.7(a)(1)(iii) 600.2, Incarcerated student 600.7(c),(e)	D. Does the institution ensure that no more than 25% of its enrolled students are incarcerated? (*Not applicable to specified programs of nonprofit institutions for whom the ED has waived the restriction.)*	_____	yes___ no___ n/a___
600.7(b)(1)	E. Does the institution count telecommunications courses as correspondence courses if the sum of telecommunications courses and other correspondence courses equals or exceeds 50% of the institution's courses?	_____	yes___ no___ n/a___
600.7(a)(1)(i) 600.7(b)	1. Does the institution ensure that fewer than 50% of its courses are correspondence courses? [*Not applicable to institutions meeting section 521(4)(C) of the Carl D. Perkins Vocational and Applied Technology Education Act.*]	_____	yes___ no___ n/a___
600.7(a)(1)(ii) 600.7(b)(1),(3) 600.7(e)	2. Does the institution ensure that no more than 50% of its regular students are enrolled in correspondence courses? [*Not applicable to institutions meeting section 521(4)(C) of the Carl D. Perkins Vocational and Applied Technology Education Act; may be waived by ED for institutions offering 2-year associate or 4-year bachelor's degrees.*]	_____	yes___ no___ n/a___
DCL GEN-98-10	3. Is the institution aware of the definition of correspondence courses and telecommunication courses?	_____	yes___ no___
600.10(d) 668.12(b)(1) 668.13(b) 668.14(h)	F. Does the institution monitor the expiration date of its eligibility so that it can submit its renewal application at least 90 days prior to the	_____	yes___ no___

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Reference	Question	Responsible Office	Response
668.26(a)	expiration of its current period of participation?		
600.10(a)(2),(b)(3) 600.21(b),(c) 668.12(b)(2),(c)(1)	G. Are all locations at which students are aided either listed in an eligibility notice from the Department of Education, or exempted from a determination of eligibility by ED?	_____	yes___no___
600.30(a)(3) 668.12(c)(1)(i)	1. Has the institution notified ED of any additional location at which it offers at least 50% of an educational program?	_____	yes___no___ n/a___
600.30(a) 668.12(c),(d) DCL GEN-97-6	H. Are appropriate institutional officials aware that the institution must notify ED in writing within 10 calendar days of a change in: ▸ accrediting agency; ▸ state authorizing agency ▸ institutional structure; ▸ the way it measures program length (i.e., from credit hour to clock hour; ▸ the SFA programs for which the institution is approved; or ▸ ownership or type of ownership (for-profit institutions only)?	_____	yes___no___
DCL GEN-97-6	1. Is the institution aware that it must obtain written approval from ED before disbursing financial aid if one of the above changes occurs?	_____	yes___no___
668.12(c),(d) DCL GEN-97-6	I. Are appropriate institutional officials aware that the institution must notify ED in writing within 10 calendar days of: ▸ the addition of non-degree programs outside of the scope of current approval; or ▸ the addition of a location?	_____	yes___no___
DCL GEN-97-6	1. Is the institution aware that it must obtain written approval from ED before disbursing financial aid if one of the above changes occurs?	_____	yes___no___
DCL GEN-97-6	J. Are appropriate institutional officials aware that the institution must notify ED in writing within 10 calendar days, but that written approval from ED is *not* required for the following changes:		

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Reference	Question	Responsible Office	Response
	1. For all institutions, changes to: ▸ name of the institution; ▸ name of a CEO, President, or Chancellor; ▸ name of the chief fiscal/financial officer; ▸ address change for a principal or other location; or ▸ change to the institution's third party servicer?	_____	yes___no___
	2. For private nonprofit and for-profit institutions only, changes to: ▸ the Board of Directors	_____	yes___no___ n/a___
	3. For foreign institutions only (including foreign graduate medical institutions), changes to: ▸ postsecondary or degree authorization; ▸ program equivalence; ▸ program criteria; or ▸ U.S. administrative and/or recruitment offices?	_____	yes___no___ n/a___
	4. For foreign graduate medical institutions only, changes to: ▸ facility at which graduate medical instruction is provided; ▸ authorizing entity or approval of authorizing entity; ▸ length of program; or ▸ programs located in the United States.	_____	yes___no___ n/a___
600.9	K. If the institution contracts with another institution or organization to provide part of its educational program, or allows its students to take courses elsewhere while still enrolled at the institution, does it enter into a written agreement with the other institution or organization?	_____	yes___no___ n/a___
600.9(a),(b)(1)	1. Does the institution give credit for courses taken under the written agreement on the same basis as if the coursework were provided by the institution itself?	_____	yes___no___ n/a___
DCL GEN 98-2	a. Is the institution aware that it may decline to give its students credit for courses where a "D" grade is earned at	_____	yes___no___ n/a___

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Items marked ✦ are effective beginning 1998-99.

Reference	Question	Responsible Office	Response
	another institution, even when it would accept a "D" grade if earned at the home institution?		
600.9(b)	2. Before the institution enters into a written agreement with an ineligible institution, does it ensure that the other institution's participation was not terminated, or that the other institution did not withdraw from participation under a termination, show cause, suspension, or similar proceeding?	_____	yes___no___ n/a___
600.9(b)(3)	3. Does the institution limit the portion of its program provided by an ineligible institution to no more than 25% (or 50%, if both institutions are not owned or controlled by the same entity, and the institution's accrediting or relevant state agency determines that the written agreement meets its standards for contracting out educational services)?	_____	yes___no___ n/a___
668.17	L. If the institution's cohort default rate is greater than 20%, is the institution following any requirements imposed on it by the Department of Education as a result of that rate?	_____	yes___no___ n/a___
Program Participation Agreement	M. Is the institution in compliance with applicable civil rights statutes and regulations?	_____	yes___no___
86.3 668.14(c)(1)	N. Does the institution have in operation a drug abuse prevention program that is accessible to any officer, employee, or student at the institution?	_____	yes___no___
86.100(b) 1998-99 FSFA Handbook, p. 3-50	1. Does the institution review its drug prevention program once every two years to determine its effectiveness and ensure its sanctions are being enforced?	_____	yes___no___
668.71 - .74	O. Does the institution ensure that statements and information given to enrolled and prospective students and their families, and to ED, do not constitute misrepresentation of the nature of its educational program, its financial charges, or the employability of its graduates?	_____	yes___no___

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Reference	Question	Responsible Office	Response
Program Eligibility			
668.8	A. Has the institution identified which of its educational programs are eligible for Title IV participation?	_____	yes___no___
600.10(c)	1. Has the institution obtained a determination of eligibility from ED for new educational programs, unless the new program: ▸ leads to an associate, baccalaureate, professional, or graduate degree; or ▸ is for the same or related occupation as a previously-designated eligible program at that institution, and is at least 8 semester hours, 12 quarter hours, or 600 clock hours long?	_____	yes___no___ n/a___
668.8(k),(l) DCL GEN-95-38	B. For undergraduate programs measured in credit hours, has the institution applied the clock/credit conversion formula to determine program eligibility *unless*: ▸ the program is at least 2 years in length and leads to an associate, bachelor's, professional, or other equivalent degree; ▸ each course within the program is acceptable for full credit toward the institution's associate, bachelor's, or professional degree, or other equivalent degree, provided the degree requires at least two academic years of study; or ▸ the institution is a public or private nonprofit hospital-based school of nursing that awards a diploma for its program?	_____	yes___no___ n/a___
668.8(i)	C. For flight training programs, does the program have a current valid certification from the Federal Aviation Administration?	_____	yes___no___ n/a___
668.8(j)(1)(i),(2)	D. For a program that consists solely of English as a Second Language (ESL) instruction, does the institution admit only students that it has documented need the ESL instruction to use already existing knowledge, training, or skills?	_____	yes___no___ n/a__

Reference	Question	Responsible Office	Response
668.8(j)(3)	1. Does the institution limit Title IV eligibility to Federal Pell Grant for ESL program students?	_____	yes___no___ n/a___
1998-99 FSFA Handbook, p. 3-11	E. Is the institution aware that students enrolled in telecommunications or continuing education programs that are eligible programs must be considered for Title IV assistance on the same basis as students enrolled in eligible programs that are offered through traditional modes?	_____	yes___no___ n/a___
668.2, Academic year 1998-99 FSFA Handbook, p. 3-10	F. Is the academic year defined in writing for each eligible program of study, in terms of weeks of instructional time and also, for undergraduate programs, in terms of credit or clock hours?	_____	yes___no___
668.2, Academic year 668.8(b)(2)	1. Does the institution define a "week of instructional time" as a consecutive seven-day period in which:		
668.8(b)(3)(i),(4)	▸ For credit-hour programs using semesters, trimesters, or quarters: at least one day of regularly scheduled instruction, examination, or preparation for examinations occurs? *NOTE: The preamble to the 11/29/96 Cash Management regulations states that a semester, trimester, or quarter that does not conform to traditional usage (i.e., for semesters and trimesters, each term is approximately 15 weeks, and full-time is defined as 12 semester or trimester hours; for quarters, each term is approximately 10 - 12 weeks and full-time is defined as 12 quarter hours), is not considered to be a semester, trimester, or quarter (FR p. 60581).*	_____	yes___no___ n/a___
668.8(b)(3)(i),(4)	▸ For all clock-hour programs: at least one day of regularly scheduled instruction, examination, or preparation for examinations occurs?	_____	yes___no___ n/a___
668.8(b)(3)(ii),(4)	▸ For credit-hour programs not using semesters, trimesters, or quarters: at least 12 hours of regularly scheduled instruction, examinations, or preparation	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
	for examinations occurs?		
668.2, Academic year 668.8(b)(4)	2. Are orientation, counseling, vacation, or other activities not related to class preparation or examinations ***excluded*** in calculating number of weeks?	_____	yes___no___
668.8(e)	G. For undergraduate programs of less than 600 clock hours that do not require an associate degree or its equivalent for admission, does the program meet the required qualitative factors (completion rate, placement rate, limits on length, minimum time in existence)?	_____	yes___no___ n/a___
668.8(e)(2)	1. Are completion and placement rate calculations substantiated in the institution's annual audit?	_____	yes___no___ n/a___
668.14(b)(26)(i)	H. If a program's stated objective is gainful employment in a recognized occupation, has the institution demonstrated a reasonable relationship -- as defined in regulation -- between the length of the program and entry level requirements for that occupation?	_____	yes___no___ n/a___
668.14(b)(26)(ii)	1. Has the institution established that the training is needed for the student to obtain employment in that occupation?	_____	yes___no___ n/a___
Administrative Requirements			
668.16(c)(2)	A. Are the functions of authorizing payments and disbursing/delivering funds to students divided so that no office has responsibility for both?	_____	yes___no___
668.16(c)(2) 668.15(f)(2),(3)	1. Are these two functions carried out by organizationally independent individuals who are not members of the same family, or who do not together exercise substantial control over the institution?	_____	yes___no___
668.25(c)	B. If a third-party servicer is used to administer any aspect of Title IV participation, does the institution's written contract with the servicer comply with regulatory requirements, including joint and several liability?	_____	yes___no___ n/a___

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Items marked ● applied to 1997-98 but not to subsequent years.
Items marked ✦ are effective beginning 1998-99.

Reference	Question	Responsible Office	Response
668.14(b)(25) 668.23(h)(4)	1. Does the institution understand that it is liable for any funds that its servicer has improperly spent, and any refunds that its servicer fails to pay?	_____	yes___no___ n/a___
668.25(e)	2. Does the institution have procedures for notifying ED, within 10 days, that it has: ▸ entered into a new contract with a third-party servicer; ▸ significantly modified an existing contract with a servicer; ▸ terminated a contract or had its contract terminated by the servicer; or ▸ discovered that its contractor has stopped providing services, gone out of business, or filed for bankruptcy?	_____	yes___no___ n/a___
668.14(b)(12) 1998-99 FSFA Handbook, p. 3-52	C. Is the appropriate institutional official aware of the need to return certifications required by the Department of Education?	_____	yes___no___
668.14(b)(19)	D. Is the appropriate institutional official aware of the requirement to complete in a timely manner federal data collection surveys [e.g., the Integrated Postsecondary Education Data System (IPEDS)]?	_____	yes___no___
668.16(o)	E. Is the institution aware that participation in required electronic processes is used as one measure of an institution's administrative capability?	_____	yes___no___
FR, 9/19/97, p. 49415 DCL GEN-97-11	1. Is the institution currently participating in the Title IV Wide Area Network (TIV WAN)? *NOTE: Participation in TIV WAN became a requirement for demonstrating administrative capability effective January 1, 1998.*	_____	yes___no___
FR, 9/19/97, p. 49415 DCL GEN-97-11	2. For the 1998-99 processing year and beyond, does the institution electronically:		

Reference	Question	Responsible Office	Response
	▸ Receive Institutional Student Information Records (ISIRs)?	_____	yes___no___
	▸ Add its Title IV code number to all applicant records within 30 days after receiving a Student Aid Report (SAR), if that SAR does not list the institution?	_____	yes___no___
	▸ Access the National Student Loan Data System?	_____	yes___no___
	NOTE: The 1998-99 processing year begins January 1, 1998.		
FR, 9/19/97, p. 49415 DCL GEN-97-11	3. ✦For the 1998-99 award year and beyond, does the institution:		
	▸ Access the Department of Education's Information for Financial Aid Professionals (IFAP) website?	_____	yes___no___
DCL ANN-98-7	*NOTE: Effective July 1, 1998, the IFAP website replaced the Student Financial Assistance Bulletin Board System (SFA BBS).*		
	▸ Submit the Application for Approval to Participate in the Federal Student Aid Programs (recertification, reinstatement, and changes) through the Internet?	_____	yes___no___
	▸ Submit the Fiscal Operations Report and Application to Participate (FISAP) through the TIV WAN?	_____	yes___no___
	4. Is the institution aware that for the 1999-00 processing year it must be:	_____	yes___no___
DCL GEN-97-11	▸ prepared to process Department of Education data using either Windows 95, Windows NT, or a newer version of the Windows operating system; and		
DCL GEN-97-11	▸ Year 2000 compliant with regard to the processing of financial aid data.		

Reference	Question	Responsible Office	Response
	NOTE: The 1999-00 processing year begins January 1, 1999.		
FR, 9/19/97, p. 49415 DCL GEN-97-11	5. Is the institution aware that for the 1999-00 award year and beyond, it must provide the following information electronically or on magnetic tape or cartridge:		
	▸ Federal Pell Grant payments to the TIV WAN?	_____	yes___no___
	▸ Student Status Conformation Reports (SSCRs) to the National Student Loan Data System (NSLDS)?	_____	yes___no___
	▸ Federal Perkins Loan Data to the National Student Loan Data System (NSLDS)?	_____	yes___no___
	NOTE: Beginning July, 1, 1999, institutions may no longer provide this information via diskette.		
668.14(b)(21)	F. Does the institution ensure that no penalty is imposed on a student who is unable to meet a financial obligation to the institution due to: ▸ required delayed disbursement of Title IV loan proceeds, or ▸ delays caused by the institution?	_____	yes___no___
668.14(b)(3) 682.603(g) 685.300(b)(10)	G. Does the institution ensure that no student is charged a fee for processing or handling any application, form, or data that is required to: ▸ determine a student's Title IV assistance, or ▸ receive any FFEL or Direct Loan benefits?	_____	yes___no___
668.24(a),(b)	H. Does the institution maintain financial and other institutional records necessary to determine the institutional eligibility, financial responsibility, and administrative capability of the institution?	_____	yes___no___
668.24(c)	I. Does the institution maintain the following records relating to student eligibility:		
668.24(c)(i)	1. The SAR or ISIR used to determine eligibility for Title IV funds?	_____	yes___no___

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Reference	Question	Responsible Office	Response
668.24(c)(ii)	2. Application data submitted to the Secretary, lender, or guaranty agency by the institution on behalf of students or parents?	_____	yes___no___
668.24(c)(iii)	3. Documentation relating to each student's or parent borrower's eligibility for Title IV funds?	_____	yes___no___
668.24(c)(iv)	4. Documentation relating to each student's or parent borrower's receipt of Title IV funds, including, but not limited to:		
	▸ The amount of the grant, loan, or FWS award; its payment period; its loan period, if appropriate; and the calculation used to determine the amount of the grant, loan, or FWS award?	_____	yes___no___
	▸ The date and amount of each disbursement or delivery of grant or loan funds, and the date and amount of each payment of FWS wages?	_____	yes___no___
	▸ The amount, date, and basis of the institution's calculation of any refunds and overpayments due to or on behalf of the student?	_____	yes___no___
	▸ The payment of any refund or overpayment to the Title IV fund, a lender, or the Secretary?	_____	yes___no___
668.24(c)(v)	5. Documentation of and any information collected at any initial or exit loan counseling required by applicable program regulations?	_____	yes___no___
668.24(c) FR, 11/27/96, p. 60494 1998-99 FSFA Handbook, p. 3-56	J. For each Title IV recipient, does the institution maintain, in addition to financial aid records, records regarding the student's admission, enrollment status, program and courses, academic progress, refunds due or paid?	_____	yes___no___
668.24(c)(vi)	K. Does the institution maintain copies of all reports and forms used by the institution in its participation in the Tile IV programs, and any records needed to verify data that appears in	_____	yes___no___

Reference	Question	Responsible Office	Response
	those reports and forms?		
668.24(c)(1)(vii)	L. Does the institution maintain documentation supporting the institution's calculation of its completion and graduation rates?	_____	yes___no___
668.24(d)(3)	1. Are appropriate instututional officials aware of acceptable formats for maintainace of required records?	_____	yes___no___
668.23(a)(2),(5)	M. Does the institution arrange a compliance audit of each fiscal year's Title IV activities by an independent auditor?	_____	yes___no___
668.23(e)(1)(ii)	1. Does the institution's arrangement with the auditor require that the auditor give ED access to records or other documents necessary to review the audit?	_____	yes___no___
668.23(b)(1)	2. Does each audit cover the period of time since the last audit?	_____	yes___no___
668.23(b)(1) FR, 11/29/96, p. 60574	3. ●Does the audit cover the partial year between July 1, 1997, and the end of the institution's fiscal year?	_____	yes___no___
668.23(b)(1)	4. Do subsequent audits cover all Title IV activities that occur during the institution's fiscal year?	_____	yes___no___ n/a___
668.23(a)(4) *Audit Guide*, 6/95 (updated 7/97), p. 1-12	5. Does the institution submit 5 copies of the audit for its most recently concluded award year to the Department of Education, within 6 months of the end of the institution's fiscal year, or in compliance with the Single Audit Act OMB Circular A-133 (● or OMB Circular A-128 as appropriate)?	_____	yes___no___
Audit Guide, 6/95 (updated 7/97), p. 1-6	6. Does the institution include with its audit report, a corrective action plan addressing any findings?	_____	yes___no___
FR, 6/30/97, p. 35378	*NOTE: Previously, two separate circulars were used to implement the Single Audit Act. Circular A-128 applied to state institutions, and A-133 (the 1990 version) applied to other not-for-profit institutions. Circular A-128 was rescinded on June 30, 1997, and*		

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Reference	Question	Responsible Office	Response
	A-133 was extended to cover all institutions. However, the requirements of A-128 and the 1990 version of A-133 remain in effect for audits of fiscal years beginning on or before June 30, 1996.		
Financial Responsibility			
668.23(a)(4) *Audit Guide*, 6/95 (updated 7/97), p. 1-12	A. Does the institution submit 5 copies of the audit for its most recently concluded award year to the Department of Education within 6 months of the end of the institution's fiscal year, or in compliance with the Single Audit Act OMB Circular A-133 (● or OMB Circular A-128 as appropriate)?	_____	yes___no___
668.15(c)(2)(iii)	1. Is the institution aware that it will not be considered financially responsible if it has been cited within the past 5 years for failure to submit audits on a timely basis?	_____	yes___no___
668.111-668.124	2. Is the institution familiar with the due process provisions applicable to program review and audit findings?	_____	yes___no___
668.15(b)(6)	3. Is the institution aware that it will not be considered financially responsible if:		
	a. In its most recent audit report the auditor expressed either substantial doubt about the institution's ability to continue as a going concern, or a disclaimer or adverse opinion?	_____	yes___no___
668.15(c)(2)(iv)	b. It fails to resolve compliance problems identified by program reviews/audits?	_____	yes___no___
668.15(c)(2)(ii)	c. As a result of a program review or audit, it must repay more than 5% of its Title IV funds for an award year?	_____	yes___no___
668.15(b)(1)	B. Are the services described in official publications and statements provided?	_____	yes___no___
668.15(b)(2)	C. Does the institution provide the administrative resources needed to meet regulatory standards for participating in the Title IV programs?	_____	yes___no___
668.15(b)(3)	D. Is the institution meeting its financial	_____	yes___no___

Reference	Question	Responsible Office	Response
	obligations, including required refunds and payment of liabilities to ED?		
668.15(b)(4)	E. Is the institution current on debt payments?	_____	yes___no___
●668.15(b)(7),(8),(9) ●668.15(d) ◆668.171-175	F. Are appropriate institutional officials familiar with the required standards for their institutional type (for-profit/nonprofit/public)?	_____	yes___no___
	NOTE: Effective July 1, 1998, the criteria by which institutions demonstrate financial responsibility have changed. The Department of Education published these changes in the Federal Register on November 25, 1997, as Subpart L to the General Provisions regulations.		
Information Sharing			
668.14(b)(4)	A. Does the institution have procedures under which it provides, in a timely manner, any information regarding its administrative capability or financial responsibility to: ▸ the U.S. Department of Education; ▸ guaranty agencies that guarantee FFEL loans for attendance at the institution or any of the institution's locations; ▸ the state agency that authorizes or approves the institution or its locations; ▸ its (or any of its locations') nationally recognized accrediting agency; and ▸ a State Postsecondary Review Entity?	_____	yes___no___
668.24(f)	B. Does the institution have procedures whereby it can provide access in a timely manner to records and personnel for: ▸ independent auditors; ▸ the U.S. Department of Education; ▸ ED's Inspector General;	_____	yes___no___

Reference	Question	Responsible Office	Response
	▸ the U.S. Comptroller General; ▸ a guaranty agency in whose program the institution participates; and ▸ its nationally recognized accrediting agency?		
682.610(f)	C. Does the institution have procedures to respond promptly to requests for any information it has about the last known address, surname, employer, and employer address of a borrower who attends or has attended the school, from: ▸ ED; ▸ a lender; or ▸ a guaranty agency?	_____	yes___no__
668.19(b) DCL GEN-96-13	D. Does the institution promptly provide financial aid transcripts to any other institutions that request them?	_____	yes___no___

Comments on Institutional Policies and Procedures _____

Comments (Cont'd)

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II. Personnel and Inter-Office Communication

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
668.16(b)(1)	A. Has the institution designated an individual to be responsible for administering and coordinating all financial aid programs?	_____	yes___no___
668.16(b)(1)	1. Is the designated individual certified by the state in which the institution is located, if the state requires certification of financial aid administrators?	_____	yes___no___ n/a___
668.16(b)(1)	a. If the state does not require certification, is the designated individual otherwise capable of administering the Title IV programs?	_____	yes___no___ n/a___
668.16(b)(3)	B. Do *all* institutional offices communicate to the designated aid administrator any information that bears on a student's eligibility for Title IV aid?	_____	yes___no___
668.16(b)(4)	C. Do written procedures or written information indicate the responsibilities of each office with respect to the approval, disbursement, and delivery of Title IV assistance and the preparation and submission of reports to ED?	_____	yes___no___
668.16(b)(2)	D. Does the institution use an adequate number of qualified persons to administer Title IV aid?	_____	yes___no___
668.45(a)(1)	E. Unless it has a waiver from ED, has the institution dedicated one or more employees to help, *on a full-time basis*, enrolled and prospective students obtain financial aid and institutional information?	_____	yes___no___
668.45(a)(2),(3)	1. Is this service available upon reasonable notice throughout the institution's normal administrative working hours?	_____	yes___no___
668.44(a)(7)	2. Does the institution publish and make readily available the title(s) of person(s) who provide this service, and how and where the individual(s) may be contacted?	_____	yes___no___
668.14(b)(22)	F. Does the institution prohibit bonuses or commissions based directly or indirectly on securing student enrollment or financial aid? (*Does not apply to recruiting ineligible foreign students; does not prohibit certain non-monetary gifts to students or alumni for referrals.*)	_____	yes___no___

Items marked ● applied to 1997-98 but not to subsequent years.
Items marked ✦ are effective beginning 1998-99.

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PERSONNEL AND INTER-OFFICE COMMUNICATION •

Reference	Question	Responsible Office	Response
668.14(b)(22)	1. Does the institution refrain from contracting with any entity that provides such incentives?	_____	yes___no___

Comments on Personnel and Inter-Office Communication _____

III. Student Consumer Information

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
	Informational Materials Regarding Financial Aid and Academic Programs		
668.41(a)(2) 668.43(a)(1),(2) 668.16(h) 1998-99 FSFA Handbook, p. 3-166	A. Does the institution describe in its informational materials all financial aid programs available at the institution, including need-based and non-need-based programs from federal, state, local, private, and institutional sources?	_____	yes___no___
668.14(b)(11)	1. Does the institution inform enrolled eligible FFEL borrowers of the availability of, and eligibility for, state grant funds from the state in which the institution is located?	_____	yes___no___
668.14(b)(11)	a. Does the institution inform out-of-state borrowers of the source of information for grants from their states?	_____	yes___no___
	B. Does the description of each financial aid program include information about:		
668.43(b)(1)	1. Procedures and forms by which students apply?	_____	yes___no___
668.43(b)(2)	2. Eligibility requirements?	_____	yes___no___
668.43(b)(3),(4)	3. Criteria by which the institution selects aid recipients and determines award amounts?	_____	yes___no___
668.44(a)(8)	C. Does the institution state in its materials that enrollment in a program of study abroad approved for credit by the home institution may be considered enrollment at the home institution for the purpose of applying for federal aid?	_____	yes___no___
668.43(c) 668.16(h)(3)	D. Do the institution's informational materials describe the rights and responsibilities of aid recipients, and specifically Title IV aid recipients, including:		
668.43(c)(1)	1. Criteria for continued eligibility?	_____	yes___no___
668.43(c)(2)	2. Institutional standards for determining satisfactory academic progress, and procedures by which a student who has failed to maintain progress may reestablish eligibility for financial aid?	_____	yes___no___

STUDENT CONSUMER INFORMATION

Reference	Question	Responsible Office	Response
668.43(c)(3)	3. Method and frequency of disbursements?	_____	yes___no___
668.43(c)(5)	4. Terms and conditions of employment provided as financial aid?	_____	yes___no___ n/a___
668.43(c)(4)	5. The terms of a student's loan, including the necessity for repayment and a sample repayment schedule?	_____	yes___no___ n/a___
HEA, Sec. 485(a)(1)(M)(i) DCL GEN-92-6	a. Do the terms describe conditions under which students receiving a Federal Perkins Loan, Direct Loan, or FFEL Loan may obtain a deferral of a loan repayment for volunteer service?	_____	yes___no___ n/a___
HEA, Sec. 485(a)(1)(M)(ii) DCL GEN-92-6	b. Do the terms describe conditions under which students receiving a Perkins Loan may obtain partial cancellation for volunteer service?	_____	yes___no___ n/a___
668.44(a)(l) 668.22(a)(3)	E. Do the institution's materials give the following costs of attending the institution: ▸ tuition and fees; ▸ books and supplies, including the costs of required supplies and equipment; ▸ room and board; ▸ transportation costs for commuters or for students living on or off campus; and ▸ any additional costs of the program in which the student is enrolled or expresses a specific interest?	_____	yes___no___
668.44(a)(2),(3) 668.16(h)(3)	F. Does the institution publish its refund policy for unearned tuition and fees or other refundable institutional costs, and the institution's policies regarding the distribution of any portion of the refund back to the Title IV programs?	_____	yes___no___
668.22(a)(2)	1. Is this statement provided prior to the earlier of the student's enrollment or execution of an enrollment agreement?	_____	yes___no___
668.22(a)(2)	2. Does the statement inform students that examples of the refund policy are available?	_____	yes___no___
668.22(a)(2)	a. Are the examples provided to students upon request?	_____	yes___no___

STUDENT CONSUMER INFORMATION

Reference	Question	Responsible Office	Response
668.22(a)(2)	3. Does the statement include procedures that a student must follow to obtain a refund?	_____	yes___no___
	4. If the institution excludes from pro-rata or Federal refund calculations the cost of equipment that is unreturnable or is not returned in good condition, does the institution:		
668.22(c)(5)(ii) 668.22(d)(3)(ii)	a. Clearly and conspicuously disclose in the enrollment agreement any restrictions on the return of equipment?	_____	yes___no___
668.22(c)(5)(ii) 668.22(d)(3)(ii)	b. Notify the student in writing prior to enrollment that return of the equipment is required within 20 days of the student's withdrawal?	_____	yes___no___
668.22(g)(3)(iii)(B)	5. If the institution does not wish to pay refunds it demonstrates would be $25 or less, does the enrollment agreement request the student's authorization to allow the institution to retain any amount of such refunds that would be allocated to the Title IV loan programs?	_____	yes___no___
	G. Do the institution's informational materials describe the academic programs of the institution, including:		
668.44(a)(4)(i)	1. Degree and other educational and training programs?	_____	yes___no___
668.44(a)(4)(ii)	2. Instructional, laboratory, and other physical plant facilities that relate to the academic program?	_____	yes___no___
668.44(a)(4)(iii)	3. Faculty and other instructional personnel?	_____	yes___no___
668.44(a)(5)	H. Do the institution's informational materials give the names of associations, agencies, or governmental bodies which accredit, approve, or license the institution and its programs?	_____	yes___no___
668.44(a)(5)	1. Does the information include procedures by which documents describing accreditation, approval, or licensing may be reviewed by enrolled or prospective students?	_____	yes___no___

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STUDENT CONSUMER INFORMATION

Reference	Question	Responsible Office	Response
668.44(b)	a. Does the institution comply with requests to review copies of these documents?	_____	yes___no___
668.44(a)(6)	I. Does the institution describe in its informational materials any special facilities, programs and services available to handicapped students?	_____	yes___no___
668.42	J. Is the required financial aid and institutional information prepared for each award year and made available through appropriate publications and mailings to all currently enrolled students and, upon request, to prospective students?	_____	yes___no___
Completion/Graduation Rate and Placement Information			
668.46(a)(1) 1998-99 FSFA Handbook, pp. 3-177 - 3-182	A. Is the institution tracking its entering certificate- and/or degree-seeking, full-time undergraduate students for the purpose of constructing its graduation (or completion) rate and its transfer-out rate?	_____	yes___no___
668.46(a)(3)(i) 668.41(c), First-time freshman student	1. Does the institution track, in each annual cohort, only first-time freshmen, as defined in regulation?	_____	yes___no___
668.46(a)(2)(i)	a. If the institution offers a predominant number of programs based on semesters, trimesters, or quarters, does the institution's cohort include only first-time freshman students who enter the institution during the fall term?	_____	yes___no___ n/a___
668.46(a)(4)(i) DCL GEN-98-11	i. Does the institution track only first time freshman students who are enrolled as of October 15, or the end of the institution's add/drop period in its fall cohort?	_____	yes___no___ n/a___
HEA Sec 485 (a)(3) ✦DCL GEN-98-11	b. If the institution does not offer a predominant number of programs based on semesters, trimesters, or quarters, does the institution's cohort include first-time freshman students who enter the institution between (●July 1 and June 30) (✦September 1 and August 31)?	_____	yes___no___ n/a___
668.46(a)(4)(ii)	i. Does the institution track first-time freshman students who have attended		yes___no___ n/a___

Reference	Question	Responsible Office	Response
	at least one day of class?		
668.46(a)(3)(ii)	c. If the institution chooses to give information about the graduation/ completion rates of students who transfer *into* the institution, does it track those students separately?	_____	yes___no___ n/a___
668.46(d)	2. Does the institution exclude from the cohort only students who: ▸ have left school to serve in the armed forces, official church missions, or a federal foreign aid service (such as Peace Corps); ▸ are deceased; or ▸ are totally and permanently disabled?	_____	yes___no___
668.46(a)(5)(b), (d) 668.41(c), *Normal time* ✦DCL GEN-98-11	3. Will the institution be able to disclose its graduation (or completion) rate and its transfer-out rate by: ▸ the January 1 following 150% of the normal time (according to the institution's catalog) for graduation (or completion) of *all* students in the cohort if 150% falls before (●June 30) (✦ August 31); or ▸ the second January 1 following 150% of the normal time (according to the institution's catalog) for graduation (or completion) of *all* students in the cohort if the program length is measured in months, and 150% falls after (● June 30) (✦August 31)? *NOTE: The first cohort for which these rates must be disclosed is the 1996-97 entering class. The institution must establish a new cohort for each succeeding award year.*	_____	yes___no___
668.46(c)(1)	4. Does the institution count in its transfer-out rate, only students who, within 150% of the normal completion time for the program, transfer into any program of an eligible institution for which the prior program provided substantial preparation?	_____	yes___no___

STUDENT CONSUMER INFORMATION

Reference	Question	Responsible Office	Response
668.14(b)(10)	B. If the institution advertises job placement rates to attract students, does it disclose the following information to prospective students at or before the time of application:		
	1. The most recent available data concerning employment statistics?	_____	yes___no___ n/a___
	2. The most recent available data concerning graduation statistics?	_____	yes___no___ n/a___
	3. Relevant licensing requirements of the state in which the school is located for any job for which the institution's educational programs are designed to prepare students?	_____	yes___no___ n/a___
	4. Any other information necessary to substantiate the truthfulness of the placement rate advertisements?	_____	yes___no___ n/a___
Campus Security and Drug Abuse Prevention Information			
668.47(a) DCL GEN-96-11 1998-99 FSFA Handbook, pp. 3-168 - 3-174	A. Does the institution publish an annual security report by September 1, containing (at minimum) the following information:		
668.47(a)(1)	1. Procedures and facilities for reporting criminal actions or other emergencies occurring on campus?	_____	yes___no___
668.47(a)(1)	a. Title of each person or organization to whom students and employees should report criminal offenses?	_____	yes___no___
668.47(a)(1)	b. Institutional responses to such reports?	_____	yes___no___
668.47(a)(2)	2. Policies concerning security of and access to campus facilities (including residences) and security considerations used in the maintenance of campus facilities?	_____	yes___no___
668.47(a)(3)	3. Policies concerning campus law enforcement, including the following:		
668.47(a)(3)(i)	a. Enforcement authority of security personnel, and whether that authority includes making arrests?	_____	yes___no___

Reference	Question	Responsible Office	Response
668.47(a)(3)(i)	b. Working relations of security personnel with State and local police agencies?	_____	yes___no___
668.47(a)(3)(ii)	c. Policies encouraging accurate, prompt reporting of all crimes to campus police and appropriate police agencies?	_____	yes___no___
668.47(a)(4),(5)	4. Description and frequency of informational programs about:		
	a. Campus security procedures/practices?	_____	yes___no___
	b. Responsibility for one's own security and the security of others?	_____	yes___no___
	c. Crime prevention?	_____	yes___no___
668.47(a)(6)(i),(ii) 668.47(d)(1)(iii) 1998-99 FSFA Handbook, p. 3-170	5. Statistics on the following criminal offenses that occurred on campus during the three most recent calendar years, as reported to local police agencies or to any institutional official with significant responsibilities for student and campus activities: ▸ murder; ▸ sex offenses (forcible and nonforcible); ▸ robbery; ▸ aggravated assault; ▸ burglary; ▸ motor-vehicle theft; and ▸ crimes of murder, forcible rape, and aggravated assault that show evidence of prejudice based on race, religion, sexual orientation, ethnicity, or disability as prescribed by the Hate Crimes Statistics Act (28 U.S.C. 534)? *NOTE: The Hate Crimes Statistics Act was amended by Public Law 105-155 to include the category of "disabled" as victims of hate crimes.*	_____	yes___no___
668.47(a)(1)	a. Policies for timely reporting of crimes listed above to the campus community?	_____	yes___no___
668.47(a)(7)	6. Policies concerning the monitoring of criminal activity in which students engaged at off-campus student organizations recognized by the institution, including	_____	yes___no___

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Reference	Question	Responsible Office	Response
	organizations with off-campus housing facilities, and the recording of that crime through local police agencies?		
668.47(a)(8) 668.47(d)(2)(ii)	7. Statistics concerning the number of arrests for the following crimes occurring on campus during the preceding calendar year: ▸ liquor law violations; ▸ drug abuse violations; and ▸ weapons possessions?	_____	yes___no___
668.47(a)(9)	8. Policies regarding the possession, use, and sale of alcoholic beverages, and the enforcement of underage drinking laws?	_____	yes___no___
668.47(a)(10)	9. Policies regarding the possession, use, and sale of illegal drugs, and the enforcement of federal and state drug laws?	_____	yes___no___
668.47(a)(11) 1998-99 FSFA Handbook, p. 3-190	10. Descriptions of drug or alcohol abuse education programs, or a cross-reference to materials used to comply with drug-free campuses requirements?	_____	yes___no___
668.47(a)(12)	11. Policies and programs regarding the prevention of sex offenses, including:		
668.47(a)(12)(i)	a. A description of educational programs to promote awareness of rape, acquaintance rape, and other forcible and nonforcible sex offenses?	_____	yes___no___
668.47(a)(12)(ii)	b. Procedures students should follow if a sex offense occurs, including who to contact, the importance of preserving evidence, and to whom the offense should be reported?	_____	yes___no___
668.47(a)(12)(iii)	c. The student's option to notify proper law enforcement authorities, including on-campus and local police, and a statement that institutional personnel will assist the student in notifying these authorities if requested by the student?	_____	yes___no___
668.47(a)(12)(iv)	d. On- and off-campus counseling, mental health, or other student services for victims of sex offenses?	_____	yes___no___

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Reference	Question	Responsible Office	Response
668.47(a)(12)(v)	e. Options for changing the victim's academic and living situations after an alleged sex offense, if reasonably available, at the victim's request?	_____	yes___no___
668.47(a)(12)(vi) DCL GEN-96-11	f. Campus disciplinary procedures in cases of alleged sex offenses, including a clear statement that: ▸ the accuser and accused are entitled to have others present during a disciplinary proceeding; ▸ both accuser and accused will be informed of the institution's final determination, and any sanction that is imposed against the accused; and ▸ the institution's final determination and any sanction that is imposed against the accused, will be provided only to the accuser who may not disclose this information to the public?	_____	yes___no___
668.47(a)(12)(vii)	g. Sanctions the institution may impose following a disciplinary proceeding regarding sex offenses?	_____	yes___no___
668.47(d)(3)	B. Are crime statistics compiled based on FBI Uniform Crime Reporting Program definitions?	_____	yes___no___
668.47(f)	C. When compiling statistics about crime on campus, does the institution regard as part of the campus: ▸ buildings or property owned or controlled (even if owned by a third party) by the institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes; and ▸ buildings or property owned or controlled by a student organization recognized by the institution?	_____	yes___no___
668.47(e)	D. Does the institution report to the campus community crimes of murder, robbery,	_____	yes___no___

Reference	Question	Responsible Office	Response
	aggravated assault, burglary, car theft, and sex offences, considered to represent a threat to students and employees?		
668.47(e) DCL GEN-96-11	1. Is this report to the campus community made in a timely manner so as to aid in the prevention of similar crimes?	_____	yes___no___
DCL GEN-96-11	a. Are the only campus officials not subject to the timely reporting requirement those with significant counseling responsibilities who are providing confidential assistance to a crime victim?	_____	yes___no___
668.47(b)(1)	E. Does the institution distribute annually the security report to all current students and employees by publications provided directly to each individual or direct mailings?	_____	yes___no___
668.47(b)(2)	F. Are prospective students and employees informed of the availability of the security report, provided a summary of its contents, and given the opportunity to request a copy?	_____	yes___no___
668.47(c)	G. Does the institution comply with the annual security report requirement separately for each campus that is not reasonably contiguous with the main campus?	_____	yes___no___
86.100(a) 1998-99 FSFA Handbook, p. 3-190	H. Is the following information provided in writing annually to all students (other than continuing education students) and employees, in a way that will reach each individual, as part of the institution's drug abuse prevention program:		
86.100(a)(1)	1. Standards of conduct prohibiting unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on the school's property or as part of the school's activities?	_____	yes___no___
86.100(a)(2)	2. Legal sanctions under local, state, and federal law for unlawful possession or distribution of illicit drugs and alcohol?	_____	yes___no___
86.100(a)(3)	3. Health risks associated with drugs and alcohol?	_____	yes___no___

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Reference	Question	Responsible Office	Response
86.100(a)(4)	4. Descriptions of drug or alcohol counseling, treatment, rehabilitation, or re-entry programs available to students or employees?	_____	yes___no___
86.100(a)(5)	5. A clear statement that the institution will impose disciplinary sanctions on students and employees for violating standards of conduct regarding drugs and alcohol?	_____	yes___no___
86.100(a)(5)	a. Descriptions of institutional sanctions, up to and including expulsion, termination of employment, and referral for prosecution?	_____	yes___no___
86.103(a)	I. Does the institution provide to the public, upon request, a copy of its drug prevention program materials and the results of its biennial review of its program?	_____	yes___no___
Athletic Aid Disclosures			
668.49(a)(1) HEA, sec. 485(e)(9) 1998-99 FSFA Handbook, pp. 3-182 - 189	A. If the institution awards athletically-related student aid, does it compile and disseminate, beginning July 1, 1997, the following annual statistical information to potential student athletes, their parents, coaches, and guidance counselors, when an offer of athletically-related aid is extended:		
668.49(a)(1)(i)	1. The number of students who attended the institution during the prior year, categorized by race and gender?	_____	yes___no___ n/a___
668.49(a)(1)(ii)	2. The number of those students (by race and gender) who received athletically-related aid, in the following sports: basketball; football; baseball; cross country/track; and all other sports combined?	_____	yes___no___ n/a___
668.49(a)(1)(iii)	3. The completion/graduation rate and transfer-out rate of all the entering, certificate or degree-seeking full time undergraduate students?	_____	yes___no___ n/a___
668.49(a)(1)(iv)	4. The completion/graduation rate and the transfer-out rate for students, by race and gender, who received athletically-related aid in: basketball; football; baseball; cross	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
	country/ track; all other sports combined (except categories with 5 or fewer students)?		
668.49(a)(1)(v)	5. The average completion/graduation and transfer-out rates for the four most recent completing or graduating classes (if available), by race and gender?	_____	yes___no___ n/a___
	6. Is the institution aware that a waiver of the requirement that an institution use ED's prescribed methodology to calculate graduation rates has been granted to NCAA Division I schools for the disclosure due on July 1, 1997, and Division I and II schools for the disclosure due on July 1, 1998?	_____	yes___no___ n/a___
	a. Does the institution understand that when an offer of athletically related student aid is made, it is still required to provide graduation rate data to a prospective student-athlete and to his or her parents; as well as to the other students, prospective students, or to the public upon request? *NOTE: The obligation of NCAA Division I (✦ and Division II) schools to provide this information individually to coaches and counselors is covered by the graduation rate book mailed to each high school by the NCAA.*	_____	yes___no___ n/a___
668.14(d)	B. If the institution offers athletically-related aid, does the institution make available to the public the amounts of revenues derived from, and expenses made by the institution for, specified intercollegiate athletics activities?	_____	yes___no___ n/a___
668.14(d)(1)	1. Is this information complied within 6 months of the end of the institution's fiscal year?	_____	yes___no___ n/a___
668.14(d)(1)	2. Is this information independently audited at least every 3 years?	_____	yes___no___ n/a___
668.48(c)	C. If the institution is co-educational and has an intercollegiate athletic program, does it prepare an annual report giving specified participation figures, coaching and staff information, revenue,	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
	and financial support information about its varsity teams?		
668.48(b)(4) 668.41(e)(2)	1. Has the institution designated an annual 12-month period that will constitute its reporting year, for which the required report was available by 10/1/96 initially and by October 15 of each successive year?	_____	yes___no___ n/a___
668.41(e)(1)(ii)	2. Does the institution inform current and prospective students of their right to request this information regarding intercollegiate athletic programs?	_____	yes___no___ n/a___
668.41(e)(1)(i) 668.41(e)(2)	3. Effective 10/1/96, does the institution provide this information promptly to any student, prospective student, or member of the public who requests it?	_____	yes___no___
Family Education Rights and Privacy Act (FERPA)			
99.7(a)(1)	A. Does the institution annually notify parents of students currently in attendance, or eligible students currently in attendance of their rights under FERPA?	_____	yes___no___
99.5(a)	1. Is the institution aware that when a student becomes an eligible student, all rights accorded, and consent required of parents transfer to the student?	_____	yes___no___
99.7(b)	2. Does the institution provide the required annual notice by means that are reasonably likely to inform parents or eligible students of their rights?	_____	yes___no___
99.7(b)(1)	a. Does the institution effectively notify parents and eligible students who are disabled?	_____	yes___no___
	B. Does the annual notice inform parents or eligible students of their right to:	_____	yes___no___
99.7(a)(2)(i)	1. Inspect and review the students educational record?	_____	yes___no___
99.7(a)(2)(ii)	2. Seek amendment of the student's educational records that the parent or	_____	yes___no___

Reference	Question	Responsible Office	Response
	eligible student believes to be inaccurate, misleading, or otherwise in violation of the student's privacy rights?		
99.7(a)(2)(iii)	3. Consent to disclosures of personally identifiable information contained in the student's educational record, except to the extent that FERPA authorizes disclosure without consent?	_____	yes___no___
99.7(a)(2)(iv)	4. File a complaint with the Department of Education concerning alleged failures of the institution to comply with the requirements of FERPA?	_____	yes___no___
	C. Does the annual notice outline procedures for parents or eligible students to:		
99.7(a)(3)(i)	• Inspect and review educational records?	_____	yes___no___
99.7(a)(3)(ii)	• Request amendment of student's educational records?	_____	yes___no___
99.10(b)	D. Is the institution aware that it must respond to a request for access to records within a reasonable period of time, but not more than 45 days after it is received?	_____	yes___no___
99.30	E. Is the institution aware of the conditions under which prior consent of the parent or eligible student is required to disclose a student's educational information?	_____	yes___no___
99.31	F. Is the institution aware of the conditions under which prior consent of the parent or eligible student is not required to disclose a student's educational information?	_____	yes___no___

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Comments on Student Consumer Information_____

Items marked ● applied to 1997-98 but not to subsequent years.
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IV. Recommended Good Practices

Practice **Comments**

A. Administration

1. The institution should be sensitive to the ethnic, cultural, and socio-economic diversity of the student population.

2. The institution should establish specific financial aid policies to achieve both short-term and long-range goals.

3. The institution should inform students, faculty, administrators, and any other relevant constituencies how and by whom financial aid policy is set.

4. The institution should have a financial aid committee composed of faculty, students, financial aid staff, and related administrative departments, which meets regularly. The committee can provide a forum for appeals and make recommendations on financial aid policy.

5. Each office should recognize its relationship to the institution and coordinate activities accordingly. The financial aid administrator should be involved in institutional decision-making that directly affects financial aid administration, such as student billing and tuition and fee charges.

6. The institution should provide adequate counseling to all financial aid applicants.

7. The institution should notify all scholarship and grant recipients that these funds, in excess of amounts used for payment of tuition, fees, books, supplies and equipment, are considered taxable income for U.S. income tax purposes, and that it is the student's responsibility to report this income on the tax return.

8. In addition to required federal and state reports, the financial aid director should prepare a comprehensive report for the institution, reinforcing the importance of financial aid to the institution. The report should include dollars applied for and spent, number of applications processed, number of students aided by program and institutional unit, and information collected from staff reports.

9. The financial aid office should periodically conduct studies or surveys in an attempt to develop realistic student budgets.

10. The institution should periodically conduct studies to identify and solve problems related to: awarding and disbursing student aid; justifying requests for additional funds; and minimizing attrition.

11. The institution should consider establishing a loan fund to meet the emergency needs of students.

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Practice **Comments**

12. Private corporate donors and investment markets should be researched as alternative sources of student aid funding. Fiscal officers experienced in investment markets and fund administration for gifts, endowments, and trusts, should meet regularly with financial aid and development officers to articulate the expanding financial needs of students and try to offset funding shortfalls.

13. The financial aid director and other appropriate institutional officials should evaluate and respond to Notices of Proposed Rulemaking (NPRMs) related to student assistance programs.

B. Office Management

1. The financial aid and fiscal offices should have a jointly developed and realistic schedule of deadlines for delivery of award authorizations and modifications to the fiscal office.

2. The financial aid office should have clear procedures for notifying the fiscal office when disbursement or release of funds must be withheld (e.g., student is overawarded or verification is incomplete). Likewise, a clear procedure is needed to release funds when the hold is no longer necessary.

3. A master calendar may be helpful in anticipating seasonal workloads. Supervisors and other employees with specific responsibilities that affect the flow of work should be encouraged to use planning calendars that correlate with the master calendar.

4. Regular reports (e.g., monthly) should be required of all staff. Reports should be brief, and might show major accomplishments as well as objectives for the following reporting period.

5. Charts illustrating the work flow of the office may help eliminate paperwork "bottle necks."

6. Special provisions, such as evening or weekend service, may be desirable to insure that students enrolled in only evening classes or in non-traditional programs have adequate access to financial aid information and other services.

7. Alternate means of augmenting staff should be explored if budget constraints affect office operation. Other departments (e.g., admissions, registrar's, or student services offices) may be able to supply assistance during financial aid office peak periods, when these other offices experience lighter workloads. Particular attention must be paid to orientation and training of temporary staff.

8. A cumulative financial aid record should be maintained for each student receiving assistance under any Title IV program.

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Practice **Comments**

9. The amount and significance of the student's cost of attendance as well as the expected parental contribution and/or student contribution should be clearly explained to each student.

10. Award notifications and denials should be approved and delivered to students in a timely fashion relative to the date of application.

11. Award notifications should contain: the terms and conditions of the award; information describing the type of aid awarded; instructions identifying the amount of aid awarded; detailed information regarding disbursement procedures; withdrawal and repayment consequences; satisfactory progress criteria; and student rights and responsibilities.

12. Upon written request, award adjustments should be provided to eligible students if funds are available.

13. Whenever practical, office procedures and functions should be automated, and all available avenues should be examined for needed equipment.

C. Policies and Procedures

1. The financial aid office should have a written packaging philosophy and a policies and procedures handbook. These should be readily accessible, understood, and adhered to by all personnel involved in making awards.

2. All office policies and procedures should be periodically reviewed and updated as necessary.

3. Complicated instructions and important information should be communicated in writing, filed systematically for reference, and, if appropriate, added to the office policies and procedures manual.

4. Specific policies and procedures should be established for the confidential treatment of all written records and for the security of information stored on computer databases. Security protection for confidential records should be available when the office is closed.

5. A process should be developed and formalized for the handling of exceptional or problem cases by the Financial Aid Committee or by the financial aid staff.

6. Deadlines for priority consideration of financial aid should be well-publicized and all application procedures and instructions communicated to students with sufficient time to permit completion of all necessary tasks.

7. The institution should develop policies concerning the acceptance of financial aid applications from late applicants.

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Practice **Comments**

8. All staff members should be familiar with students' rights and responsibilities under the Family Educational Rights and Privacy Act (FERPA).

9. Office policies should specify storage time for paperwork, in order to comply with the requirements of federal and state regulations as well as institutional policies for archiving records.

10. The institution should have a method of identifying Title IV applicants who were admitted without a high school diploma or its recognized equivalent.

11. Appropriate institutional administrators, faculty, and students should be involved in the development and evaluation of the institution's satisfactory academic progress (SAP) policy. The policy should be evaluated periodically to insure its continued appropriateness.

12. Faculty advisors, counselors and other institutional personnel involved directly with students should be aware of the SAP policy. The policy should be published in appropriate institutional literature and distributed to all financial aid applicants.

13. There should be a reasonable relationship between the SAP policy and the institution's academic probation/suspension policies.

14. Student performance should be reviewed on a timely basis to provide affected students an opportunity to plan a strategy for regaining eligibility. During any probationary period, students should be encouraged to use the institution's counseling, tutoring, testing and other related services that may be able to assist them.

15. The SAP policy should take into account attendance on a less than full time basis; and should address transfer credits.

D. General Recordkeeping

1. Student records should be well-organized and stored in a systematic way to assure confidentiality of information. Student records should be separated from unrestricted files.

2. Student interviews should be documented, dated, and signed by the individual responsible for the interview.

3. Entries to student financial master records should be kept current, complete, and legible.

4. All documents in each student file should be completed and signed by all appropriate parties as required.

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Practice **Comments**

5. The Financial Aid Director should approve or spot-check financial aid records and other work delegated to staff to insure consistency and compliance with all statutes, regulations, and institutional policies.

6. Forms used in financial aid administration should be reviewed and updated annually. Forms should be dated and numbered.

7. An inventory of forms and supplies should be maintained to avoid delays due to depletion of stock.

8. A form and form-letter log book should be established to keep samples of all forms and form-letters used in the office. The log should show a form number, revision date if any, and the number of documents ordered or printed on a given date, as well as the delivery date. This will provide helpful information for form control and timely ordering. It may also help to have a short description of the use of each form.

9. All staff, from director to student employees, should keep daily and weekly totals on student contact including telephone calls, intake/reception contacts, walk-in counseling, and appointments. Processing totals should also be kept for applications processed, documents tracked, verifications completed, folders prepared, and any other statistics that can be documented. These statistics are invaluable in documenting need for additional staff, space, and automation.

E. Personnel and Training

1. An organizational chart for the financial aid operation may help to clarify staff responsibilities and interaction.

2. All financial aid staff should be sufficiently trained to comply with federal regulations and other program requirements.

3. Financial aid staff salaries and benefits should be comparable to similar positions elsewhere within the institution and within the profession at comparable institutions. There should be provision for upward or lateral mobility within the institution.

4. Peer counselors and/or work-study students may be considered to assist regular staff, especially during peak workloads. If students or part-time workers are used, careful attention should be given to instructing them regarding the confidentiality of student records.

5. Each office should have written personnel policies, practices, and job descriptions. Each staff member should be performing the duties specified in the job description. Job descriptions should be reviewed annually and updated as necessary, especially when hiring new staff.

6. Staff evaluations should be conducted at regular intervals.

7. Regular staff meetings on policy and procedure development should be

Practice **Comments**

held. An agenda should be prepared for each staff meeting to ensure time is productively used and all necessary information is covered.

8. Ongoing, in-service training should be provided on new regulations, counseling techniques, community resources, and changes to institutional and office policies.

9. Staff members should be involved in on-going training regarding ethical considerations within professional judgment.

10. Staff members should be trained to assist students in obtaining information and establishing eligibility for all available resources (e.g., private scholarships, BIA, veterans benefits, AFDC, Workman's Compensation, Rehabilitation benefits, unemployment benefits, student health insurance, and non-need based loans).

11. Administrators should be aggressive in searching out training opportunities. Training assistance may be available from financial aid need analysis services, professional organizations, faculty members, and community volunteers.

12. Staff members should be encouraged to participate in financial aid conferences, workshops, and other professional development activities.

13. Supervisors should be encouraged to attend workshops to strengthen their skills in such areas as motivation, providing appropriate role models, and dealing with problem employees or problem students.

14. Separate personnel files should be maintained for each employee. Files should contain: copies of appointment papers; records of all promotions and pay increases; copies of disciplinary action and all performance evaluations; records of attendance, sick leave and vacation; and any other personnel action involving the employee. Personnel files should be accessible only to the director, the employee, and other persons authorized by the director.

15. Supervisors should be familiar with Equal Employment Opportunity Code requirements and with the institution's hiring policies.

16. Supervisors should be familiar with the institution's employee grievance policies and procedures.

17. Skillful interviewing techniques should be cultivated by staff members who participate on search committees.

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Practice **Comments**

F. Space and Facilities

1. The financial aid office and other student services should be conveniently located and accessible to students with disabilities.

2. The office space and arrangement should enhance the functions of the office. Specifically, provisions should be made for privacy during student-counselor conferences to ensure confidentiality. For efficiency, the reception and general office work areas should be separate.

3. Space should be allocated for seasonal peak workloads, to allow for the addition of temporary employees as needed.

4. Whenever changes in space, facilities, or equipment are discussed, long-range plans as well as immediate needs should be considered.

G. Fiscal

1. Accounting and disbursing functions must be separated from financial aid program administration functions. According to federal regulations, the functions of awarding and disbursing federal financial aid may not be performed by the same office or members of the same family.

2. An institutional scholarship/grant/loan/job development program may prove useful in locating additional funding sources.

3. Accurate ledgers or electronic spreadsheets of all operational expenses should be kept, for analysis of spending history and forecasting and for accurate projection of future office budget needs.

4. Office furniture and equipment should be accurately inventoried by using a computer database, or file cards that will allow reports to be generated for new equipment requests and institutional inventories.

5. A system should be established for requisitioning and ordering paper, forms, supplies, and other expendable items. The system should provide analysis of past usage and projection of future needs.

6. Office directors must be familiar with office budget construction and the institution's budget process. It may be helpful to arrange for "education" sessions with the budget officer to learn as much as possible about the budget process.

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Practice **Comments**

H. Other Comments by Preparer or Reviewer on Institution's Practices

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N·A·S·F·A·A

Self-Evaluation Guide for Institutional Participation in Title IV and Other Federal Programs

PART 2: ADMINISTRATION OF FEDERAL PROGRAMS

I. Title IV General Provisions

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
General Procedures			
668.14(b)(1)	A. Are federal funds used only for the purposes specified in program regulations (primarily making payments to eligible students and payment of allowable administrative expense)?	_____	yes___no___
DCL GEN-93-3	B. Does the institution disburse Title IV funds (or deliver FFEL proceeds other than PLUS) only if an official EFC (calculated by ED's Central Processing System) has been received?	_____	yes___no___
668.16(f)	C. Does the institution have a system for verifying the accuracy of information if inconsistencies arise from different sources with respect to a student's application for financial aid?	_____	yes___no___
668.16(g)	1. Does the institution refer suspected fraud to the Department of Education's Office of Inspector General?	_____	yes___no___
668.61, 682.604(h) 690.79 673.5	D. Does the institution have procedures for the collection or treatment of overawards when they occur?	_____	yes___no___
668.20(d),(e)	E. Does the institution observe the one-academic-year limit on non-credit or reduced-credit remedial coursework, other than English as a Second Language (ESL) courses, for which a student can be paid Title IV funds?	_____	yes___no___ n/a___
668.20(c)	1. Does the institution regard as ineligible any remedial coursework if: • it is part of a program leading to a high school diploma or its equivalent; • the educational level of instruction is below the secondary level; or	_____	yes___no___ n/a___

Reference	Question	Responsible Office	*Response
	▸ the educational level is below that needed to pursue successfully the institution's degree/certificate program after one year in the remedial course?		
668.9	F. For students enrolled in undergraduate credit hour programs less than two years in length and subject to the clock/credit conversion formula, are the number of credits used to determine the amount of aid based on at least 30 clock hours of instruction per semester hour or at least 20 clock hours of instruction per quarter hour?	_____	yes__no___ n/a___
668.14(b)(14)	G. Does the financial aid office have procedures to ensure that it does not deny federal aid *solely* on the grounds that a student is in a study abroad program, if the institution approves that program for credit?	_____	yes___no___ n/a___
668.2, Full-time student	H. For undergraduate students, does the institution define full-time as at least the following number of credit or clock hours:		
	1. For credit hour semester, trimester, or quarter term programs: 12 semester or quarter hours per term?	_____	yes __no___ n/a___
	2. For credit hour programs not using semesters, trimesters, or quarters: 24 semester hours or 36 quarter hours per academic year (or a prorated equivalent for a program of less than one academic year)?	_____	yes___no___ n/a___
	3. For clock hour programs: 24 clock hours per week?	_____	yes___no___ n/a___
	4. For programs using combined clock and credit hours, the applicable minimum in 668.2 under the definition of *Full-time Student*?	_____	yes___no___ n/a___
	5. For a series of courses or seminars: the equivalent of 12 semester or quarter hours in a maximum of 18 weeks?	_____	yes___no___ n/a___
	6. The work portion of a cooperative education program in which the amount of work	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
	performed is equivalent to the academic workload of a full-time student?		
Student Eligibility			
668.32(a)(1)(i)	A. Does the institution ensure that each recipient of federal student aid funds is a regular student, enrolled or accepted for enrollment in an eligible program?	_____	yes___no___
668.32(a)(1)(ii)	1. For FFEL or Direct Loans, if not a regular student in an eligible program, is the student enrolled in a course of study necessary for enrollment in an eligible program?	_____	yes___no___
668.32(a)(1)(ii)	a. Is this status funded for no longer than a single 12-month period?	_____	yes___no___
DCL GEN-98-2	*NOTE: Previously, students holding 4-year degrees who were enrolled in coursework necessary for enrollment in an eligible graduate or professional program were only eligible to borrow at the first-year undergraduate loan level. Effective for any Direct Loan originated, or FFEL loan certified on or after January 16, 1997, this category of students may borrow at the fifth-year undergraduate level.*		
668.32(a)(1)(iii)	2. For Federal Perkins Loans, FWS, FFEL, and Direct Loans, if not a regular student in an eligible program, is the student enrolled or accepted for enrollment *at least half-time* in a program necessary for teaching certification from a state?	_____	yes___no___
668.32(b)	B. Does the institution ensure that Title IV recipients are not enrolled in either an elementary or a secondary school?	_____	yes___no___
668.32(e)	C. Does the institution ensure that Title IV recipients have a high school diploma, its equivalent, or the ability to benefit from the education or training offered?	_____	yes___no___
668.32(e) 668.151	1. If the institution does not participate in an ED-approved state process, does it ensure that Title IV recipients admitted without a	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
1998-99 FSFA Handbook, pp. 2-10 - 2-15 FR, 10/25/96, p. 55542 FR, 3/7/97, p. 10545	high school diploma or its recognized equivalent have a passing score on an ED-approved test?		
668.32(e)(2)	a. Does the institution ensure that the student received a passing score on the test within 12 months before the date federal financial aid is initially received?	_____	yes___no___ n/a___
668.151, 668.152 668.142, Assessment Center	b. Is the test independently administered by either a certified test administrator or an assessment center as defined in regulation?	_____	yes___no___ n/a___
668.33(a)	D. Does the institution ensure that only U.S. citizens or eligible noncitizens receive Title IV funds?	_____	yes___no___
668.33(c)	1. If the Social Security Administration database match does not confirm a student's claim of U.S. citizenship, does the institution require the student to document U.S. citizenship?	_____	yes___no___
668.33(c)(2)	a. Does the institution give the student at least 30 days notice to provide documentation of U.S. citizenship?	_____	yes___no___
668.133(a)(1)	2. If, for an eligible noncitizen for whom documentation is required, the INS database match does not result in primary confirmation, or if the institution has conflicting information, is secondary confirmation employed?	_____	yes___no___
668.134	a. Does the institution have policies and procedures for requesting proof and securing confirmation of a student's immigration status, which includes providing the student with: ▸ deadlines for submitting documentation; and	_____	yes___no___

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Reference	Question	Responsible Office	Response
	▸ consequences for not meeting the deadline?		
668.134(a)(3) 668.137(a)	b. Does the institution give the student at least 30 days from the date it receives the student's output document to provide documentation of eligible noncitizen status, before determining that the student is ineligible?	_____	yes___no___
668.137(b)	i. Are students who fail to provide documentation by the specified deadline denied Title IV assistance for the award year?	_____	yes___no___
668.135	c. Does the institution submit a copy of the student's INS documentation for secondary confirmation within 10 business days of receiving it?	_____	yes___no___
668.136(b)	d. If the INS does not respond to the institution's request for secondary confirmation within 15 business days, does the institution make its own determination of eligibility?	_____	yes___no___
668.139	i. Does the institution attempt to recover funds disbursed to students subsequently found to be ineligible?	_____	yes___no___
668.133(b)(1)(ii)	e. Does the institution exclude from secondary confirmation a student who completed it the previous year only if the documents used for confirmation have not expired?	_____	yes___no___
668.33(b)	3. Does the institution restrict Title IV aid for eligible citizens of the Federated States of Micronesia, the Marshall Islands, and Palau to Federal Pell Grant, FSEOG, and FWS?	_____	yes___no___ n/a___
668.32(i)	a. Does each Title IV recipient have a correct Social Security Number (SSN), except for residents of Palau, the Marshall Islands, or the Federated States of Micronesia?	_____	yes___no___
668.36(a)(3)	i. If a student's SAR or ISIR does not indicate the SSN was verified, or	_____	yes___no___

Reference	Question	Responsible Office	Response
	the institution has reason to believe a verified number is inaccurate, does the institution require the student to submit evidence of an accurate SSN within at least 30 days or until the end of the award year, whichever is later?		
668.36(a)(4)	4. Does the institution ensure that it does not deny, reduce, delay, or end a student's eligibility because verification of the student's SSN is pending?	_____	yes___no___
668.36(b)(2)	5. Does the institution ensure that an incorrectly reported SSN is corrected?	_____	yes___no___
668.32(h)	E. Has each Title IV recipient filed a Statement of Educational Purpose as part of the FAFSA or with the lender in the case of FFEL only?	_____	yes___no___
668.32(j) 668.37	F. Has the institution determined each Title IV recipient's registration status with the Selective Service, by obtaining: ▸ an output document confirming the student's registration; or ▸ clear and unambiguous evidence that the student is not required to be registered; or ▸ other proof that the student is registered; or ▸ evidence that the student's failure to register does not make him ineligible for Title IV aid?	_____	yes___no___
668.37(c)(2)	1. If the SAR or ISIR does not confirm a student's Selective Service registration, does the institution require the student to provide appropriate documentation within at least 30 days or until the end of the award year, whichever is later?	_____	yes___no___
668.32(g)(2)	G. Does the institution ensure that Title IV recipients have not borrowed in excess of annual or aggregate Title IV loan limits?	_____	yes___no___
DCL GEN-96-14	1. Does the institution certify Unsubsidized Stafford and Direct Unsubsidized Stafford	60_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
	loans in excess of annual maximums only for HEAL eligible students who were unable to borrow under that program due to budgetary restrictions?		
DCL GEN-97-4	a. Beginning June 1, 1997, does the institution ensure that it certifies a FFEL or originates a Direct Loan only if the student is enrolled full-time?	_____	yes___no___ n/a___
668.35(b)	2. Is a student who inadvertently borrowed in excess of loan limits considered eligible upon repayment of the excess amount, or upon making satisfactory repayment arrangements?	_____	yes___no___
668.32(g)(4)	H. If a student owes an overpayment on a Title IV grant or Federal Perkins Loan, does the institution deny Title IV assistance?	_____	yes___no___
668.35(e)	1. Does the institution consider the student eligible if the overpayment is: ▸ Federal Pell Grant, and can be eliminated by adjusting subsequent Pell payments in the same award year; or ▸ FSEOG, SSIG, or Perkins Loan, and can be eliminated by adjusting subsequent Title IV aid (other than Federal Pell Grant) in the same award year?	_____	yes___no___
668.35(c)	2. Does the institution consider the student eligible if he/she: ▸ pays an overpayment in full; or ▸ makes payment arrangements satisfactory to the holder of the overpayment?	_____	yes___no___
668.32(g)(1)	I. Does the institution deny Title IV aid to a student who is in default on a Title IV loan?	_____	yes___no___
668.35(a)	1. Is a student in default considered eligible for Title IV aid if: ▸ the student makes satisfactory arrangements with the holder to repay	_____	yes___no___

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Reference	Question	Responsible Office	Response
	the loan and makes at least six consecutive monthly payments; or ▸ the student repays the loan in full?		
668.35(f) DCL GEN-95-40	J. Does the institution consider a student whose defaulted loan or Title IV overpayment was discharged or is dischargeable in bankruptcy to be eligible for Title IV assistance?	_____	yes___no___
1998-99 FSFA Handbook, pp. 2-26-27	1. Is the institution aware that a student does not have to reaffirm a loan previously discharged in bankruptcy in order to be eligible for Title IV aid?	_____	yes___no___
668.32(f) 690.75(c),(d)	K. Does the institution determine whether each Title IV recipient is maintaining satisfactory academic progress?	_____	yes___no___
668.16(e)(2)(i)	1. Does the policy include a qualitative measure such as grades, work projects completed, or other comparable factors?	_____	yes___no___
668.16(e)(2)(ii)	2. Does the policy include as a quantitative measure a maximum time frame in which a student must complete his or her educational program?	_____	yes___no___
668.16(e)(2)(ii)(A)	a. For an undergraduate program, is the maximum time frame no longer than 150% of the published length of the educational program?	_____	yes___no___
668.16(e)(2)(ii)(B)	3. Is the time frame divided into increments no longer than one academic year or one-half of the program, whichever is less?	_____	yes___no___
668.16(e)(2)(ii)(C)	4. Does the institution designate the minimum amount of work that a student must successfully complete at the end of each increment to complete the program within the maximum time frame?	_____	yes___no___
668.16(e)(1)	5. Is the policy for Title IV recipients the same as or stricter than that for non-recipients?	_____	yes___no___
668.16(e)(4)	6. Does the institution review each student's progress at the end of each increment?	_____	yes___no___

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Reference	Question	Responsible Office	Response
668.16(e)(2)(ii)(D)	7. Do the institution's policies define the effect of course incompletes, withdrawals, repetitions, and noncredit remedial courses on satisfactory progress?	_____	yes___no___
668.16(e)(5)	8. Has the institution established a specific appeal process?	_____	yes___no___
668.16(e)(6)	9. If a student is denied aid due to lack of satisfactory academic progress, does the policy specify what a student must do to be reinstated?	_____	yes___no___
1998-99 FSFA Handbook, p. 2-22	a. If a student regains eligibility, is Pell Grant and campus-based aid given only for the payment period in which eligibility is regained, and not for periods in which the student did not meet the satisfactory progress standards? *NOTE: Students who do not meet satisfactory progress at the beginning of a period of enrollment, but who meet the standards later in that period are eligible for FFEL and Federal Direct Loans for that entire period of enrollment.*	_____	yes___no___
668.34(a),(b),(e)	10. Does the institution review progress at the end of each academic year, and require the equivalent of a "C" average or academic standing consistent with institutional graduation requirements by the end of the second academic year, for all Title IV recipients enrolled in any program longer than two academic years?	_____	yes___no___ n/a___
668.34(c)	a. Is this requirement waived only if failure to meet it is due to the student's injury or illness, death of a relative, or other special circumstances?	_____	yes___no___ n/a___
668.34(d)	b. Is eligibility reinstated once the student obtains academic standing consistent with graduation requirements?	_____	yes___no___ n/a___
●DCL GEN 97-2 ●DCL GEN 96-18	11. Does the institution determine whether satisfactory progress requirements should be	_____	yes___no___ n/a___

Reference	Question	Responsible Office	Response
	waived for students who were unable to meet the institution's standards due to specified natural disasters?		
668.32(g)(3) 668.35(d)	L. Are students whose property is subject to a judgment lien for a federal debt considered ineligible for Title IV aid unless the student has paid the debt in full or made satisfactory payment arrangements?	_____	yes___no___
668.38(a)	M. Are correspondence students awarded Title IV aid only if the correspondence courses are part of an associate, bachelor's, or graduate degree program?	_____	yes___no___ n/a___
668.38(b)	1. Does the institution consider students enrolled in telecommunications courses to be correspondence students unless: ▸ the total number of correspondence and telecommunications courses provided by the institution is fewer than 50% of the courses provided in the award year; and ▸ the student's program leads to an associate, bachelor's, or graduate degree?	_____	yes___no___ n/a___
DCL GEN-98-10	*NOTE: The Department of Education considers a telecommunications course to be one that is delivered principally through the use of television, audio, or computer transmission. Generally, a course that is delivered by video cassette or disc recording is not considered a telecommunications course, unless the institution also delivers comparable instruction to students physically attending classes during the same award year.*		
Appendix B to ED's annual *Guide to SARs and ISIRs*	N. Are all SAR/ISIR comments indicating a problem or potential problem with student eligibility resolved?	_____	yes___no___
668.19(a)(1) 1998-99 FSFA Handbook p. 2-41	O. Does the institution determine whether a student has attended another eligible institution, and inform the financial aid office of that fact?	_____	yes___no___
668.19(a)(2)(i),(ii)	1. Before disbursing any Title IV funds to a	_____	yes___no___

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Reference	Question	Responsible Office	Response
668.19(a)(5)(ii) DCL-96-13	transfer student, does the institution obtain a financial aid history by : ▸ obtaining information from the National Student Loan Data System (NSLDS); or ▸ requesting a financial aid transcript (FAT) from each previous institution, except foreign schools.		
1998-99 FSFA Handbook p. 2-40	*Note: Presently, institutions are strongly encouraged to use NSLDS for financial aid histories, but they are not required to do so. An institution may still request a financial aid history through a paper FAT.*		
DCL-96-13 1998-99 FSFA Handbook p. 2-45	a. Does the institution limit the use of the NSLDS for collection of financial aid histories for students who transferred at mid-year to: ▸ queries made for students who attended the prior institution before the beginning of that institution's academic year (i.e. summer attendees); or ▸ queries made at least 60 days after a student ceases attending the prior school, or if made prior to 60 days? *NOTE: If an institution queries NSLDS no earlier than 60 days after the student ceases attending the prior school, it may make an initial disbursement of Federal Pell Grant or campus-based funds, or certify a FFEL loan or originate a Direct Loan. Subsequent disbursements may not be made, nor may loan funds be released, before eligibility is confirmed.*	_____	yes___no___
668.19(a)(3)(i),(ii)	b. If the institution collects FATs and allows disbursement of Federal Pell Grant and campus-based funds before FATs are received, does it limit disbursement to one payment period only?	_____	yes___no___

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Reference	Question	Responsible Office	Response
1998-99 FSFA Handbook, p. 2-46	i. Once FATs are received, does the institution make any necessary adjustments to the student's awards?	_____	yes___no___
1998-99 FSFA Handbook, p. 2-46	ii. Does the institution attempt to collect disbursed funds from the student if the FAT: ▸ is not received, or ▸ shows the student is ineligible?	_____	yes___no___
668.19(a)(3)(iii),(v), (vi)	c. If the institution certifies a Federal Stafford Loan or Federal PLUS application prior to receiving FATs, does it withhold the loan proceeds until the FATs are received?	_____	yes___no___
668.19(a)(3)(iv), (v),(vi)	d. If the institution chooses to originate a Direct Stafford or Direct PLUS Loan prior to receiving FATs, does the institution withhold disbursement until the FATs have been received?	_____	yes___no___
668.19(a)(4)(ii)	e. Does the institution return Federal Stafford Loan proceeds within 45 days of receipt, if financial aid transcripts are not received? *NOTE: Although the 1998-99 FSFA Handbook indicates that proceeds must be returned within 10 days, the General Provisions regulations allow 45 days. Department of Education officials have confirmed for NASFAA that the regulation remains in effect.*	_____	yes___no___
668.19(a)(4)(ii)	f. If, once received, the FAT shows that a student is not eligible for FFEL proceeds being held, does the institution return any ineligible portion to the lender?	_____	yes___no___
674.9(c), 675.9(c) 676.9(c), 690.75 682.201(a)(2)(i) 685.200(a)(2)(i)	P. Does the institution ensure that Federal Pell Grant, FSEOG, Federal Perkins Loans, FWS, and subsidized Federal Stafford or Direct Loans are awarded only to students who demonstrate financial need under the Federal Methodology?	_____	yes___no___
674.9(c)	1. Is a member of a religious order (as specified	66	yes___no___

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Reference	Question	Responsible Office	Response
675.9(c) 676.9(c) 682.301(a)(2) 685.200(a)(2)(ii) 690.75(e)	in regulation) considered to have no financial need, and therefore no eligibility for Title IV aid other than unsubsidized loans, if the order provides subsistence support or has directed the member to pursue the course of study?		
HEA Sec. 472 1998-99 FSFA Handbook, p. 2-57	Q. Does the institution construct student cost of attendance (COA) budgets in accordance with statute?	_____	yes___no___
HEA, Sec. 472(7) 1998-99 FSFA Handbook, p. 2-59	1. For a student enrolled in a study abroad program approved for credit by the home institution, does the COA include reasonable associated costs?	_____	yes___no___
HEA, Sec. 472(8) 1998-99 FSFA Handbook, p. 2-59	2. For a student with dependents, does the COA include a dependent care allowance that:		
	a. Covers periods including, but not limited to, class-time, study-time, field work, internships, and commuting time?	_____	yes___no___
	b. Is based on the number and age of dependents?	_____	yes___no___
	c. Is limited to the reasonable cost in the student's community for the kind of care provided?	_____	yes___no___
HEA Sec. 472(9) 1998-99 FSFA Handbook, p. 2-59	3. For a student with a disability, does the COA include an allowance for expenses related to the disability that are reasonably incurred and not provided for by other assisting agencies?	_____	yes___no___
HEA Sec. 472(12) 1998-99 FSFA Handbook, p. 2-59	4. For a student receiving FFEL or Direct Loans, does the COA include actual loan fees or average loan fees at the institution for the type of loan received?	_____	yes___no___
1998-99 FSFA Handbook, p. 2-59	a. Is the institution aware that it may also include fees for non-federal student loans used to cover the cost of attendance at the institution?	_____	yes___no___
HEA Sec. 479(11) 1998-99 FSFA Handbook, p. 2-59	5. For a student in a cooperative education program, does the COA include reasonable costs associated with the work experience?	_____	yes___no___

Reference	Question	Responsible Office	Response
HEA Sec. 472(4) 1998-99 FSFA Handbook, p. 2-59 DCL GEN-89-49	6. For a student enrolled less than half-time, is the COA limited to tuition, fees, books, supplies, transportation, dependent care costs, and, under professional judgment, a disability allowance?	_____	yes___no___
HEA Sec. 472(5) 1998-99 FSFA Handbook, p. 2-60	7. For a student enrolled in a correspondence program, is the COA limited to tuition and fees?	_____	yes___no___
HEA Sec. 472(5) 1998-99 FSFA Handbook, p. 2-60	a. Is the institution aware that if the student is required to fulfill a period of residential training, the COA can also include books and supplies, an allowance for travel, and room and board costs specifically incurred?	_____	yes___no___
HEA Sec. 472(6) 1998-99 FSFA Handbook, p. 2-60	8. For an incarcerated student, is the COA limited to tuition and fees, and books and supplies?	_____	yes___ no___
1998-99 FSFA Handbook, p. 1-31	R. Are professional judgment adjustments to dependency status or cost of attendance, or to data items used to calculate the student's EFC, made on a case-by-case basis and clearly documented in the student's file?	_____	yes___no___
Verification			
668.54(a)(2)(i)	A. Does the institution have procedures to identify applicants selected for verification by the Central Processing System (CPS)?	_____	yes___no___
668.54(a)(2)	1. Does the institution verify all CPS-selected applicants unless it chooses to exercise the optional limit of 30% of the institution's total Title IV aid applicants?	_____	yes___no___
1998-99 Verification Guide, p. 6	a. If the institution exercises the 30% option, has it developed:		
	▸ a consistently-applied definition of "applicant?"	_____	yes___no___ n/a___
	▸ a method to determine the number of *CPS-selected* applicants that constitutes 30%?	_____	yes___no___ n/a___
	▸ a method to ensure that the number	_____	yes___no___

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Reference	Question	Responsible Office	Response
	of verifications required to reach 30% is *completed*?		n/a___
	▸ a method to ensure that no application containing conflicting information goes unverified even once the 30% limit is reached?	_____	yes___no___ n/a___
668.54(a)(3)	B. Does the institution require applicants not selected by the CPS to verify information that the institution has reason to believe is inaccurate?	_____	yes___no___
668.54(b)(2) 1998-99 Verification Guide, pp. 8-10	C. Does the institution exclude from verification the following applicants *only if* the institution has no conflicting information:		
668.54(b)(2)(i)(A) 1998-99 Verification Guide, p. 10	▸ legal residents (both student and parents if the student is dependent) of the Commonwealth of the Northern Mariana Islands, Guam, or American Samoa?	_____	yes___no___
668.54(b)(2)(i)(B) 1998-99 Verification Guide, p. 10	▸ citizens (both student and parents if the student is dependent) of the Marshall Islands, Federated States of Micronesia, or the Republic of Palau?	_____	yes___no___
668.54(b)(2)(iv) 1998-99 Verification Guide, p. 8	▸ immigrants who arrived in the U.S. during either calendar year of the award year?	_____	yes___no___
668.54(b)(2)(ii) 1998-99 Verification Guide, p. 8	▸ applicants who are incarcerated at the time of verification?	_____	yes___no___
668.54(b)(2)(vii) 1998-99 Verification Guide, p. 10	▸ applicants who receive no aid, for reasons other than his or her failure to complete verification?	_____	yes___no___
668.54(b)(2),(3) 1998-99 Verification Guide, p. 9	D. Does the institution exclude the following application data from verification *only if* the institution has no conflicting information:		
668.54(b)(2)(iii) 668.54(b)(3)(iii)	▸ information of a parent (or spouse) who resides outside the U.S. and cannot be contacted by normal communications?	_____	yes___no___

Reference	Question	Responsible Office	Response
668.54(b)(2)(v) 668.54(b)(3)(iv)	▸ information of a parent (or spouse) whose address is unknown and cannot be obtained by the applicant?	_____	yes___no___
668.54(b)(2)(vi) 668.54(b)(3)(i),(ii)	▸ information of a parent (or spouse) who is physically or mentally incapacitated, or deceased?	_____	yes___no___
668.54(b)(2)(viii) 1998-99 Verification Guide, p. 9	E. If it chooses to exclude from verification a transfer student who was verified for the same award year, using the same application, by the prior institution, does the institution obtain a letter from the prior institution that:		
	▸ States the application was verified?	_____	yes___no___ n/a___
	▸ Gives the transaction number of the verified application?	_____	yes___no___ n/a___
	▸ Gives the provision used, if any, for not recalculating the applicant's EFC?	_____	yes___no___ n/a___
668.54(b)(1) 1998-99 Verification Guide, p. 8	F. Does the institution exclude from verification an applicant who died during the award year?	_____	yes___no___
668.60(e) 1998-99 Verification Guide, p. 8	1. Do the institution's procedures allow disbursements made prior to the student's death to stand, but ensure that no further disbursements are made?	_____	yes___no___
668.53(a) 1998-99 Verification Guide, pp. 55-56	G. Does the institution have written policies and procedures for verifying information contained in selected applications, including, at a minimum:		
668.53(a)(1)	1. Time frames within which applicants must submit verification documents?	_____	yes___no___
668.58(a)(2)(ii),(c) 668.58(a)(2)(B)	a. Is the time frame consistent with other requirements (e.g., 45-day limit on holding FFEL and Direct Loan funds; 60-day limit on interim FWS employment prior to completion of verification)?	_____	yes___no___
668.53(a)(2)	2. Consequences of an applicant's failure to	_____	yes___no___

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Reference	Question	Responsible Office	Response
1998-99 FSFA Handbook, p. 35	provide requested information within the specified time frame?		
668.53(a)(3)	3. Procedures to notify applicants of verification results if a consequent change in the applicant's EFC results in a change in the applicant's award or loan?	_____	yes___no___
668.53(a)(4)	4. Procedures an applicant must follow to correct erroneous information?	_____	yes___no___
668.53(a)(5)	5. Procedures for referring suspected fraud?	_____	yes___no___
668.53(b)	6. Procedures for providing selected applicants a clear and timely explanation of their responsibilities, including required verification documentation, deadlines, and consequences of failing to complete any required action?	_____	yes___no___
668.61(a),(b)	7. Procedures governing any overpayments resulting from verification for which the student is responsible?	_____	yes___no___
668.56 668.57	H. Does the institution ensure that for each selected application, all applicable items are verified, using acceptable documentation?	_____	yes___no___
668.57	1. Does the institution have a procedure for determining when alternate forms of documentation, as specified in regulation, may be used?	_____	yes___no___
668.54(a)(4) 668.55(a)(2)	I. Does the institution verify all previously unverified information on all subsequent applications of selected applicants within an award year?	_____	yes___no___
668.55(a)(1)(I) 668.55(b)	J. Does the institution require household size and number in college to be updated at verification, for selected applicants?	_____	yes___no___
668.55(a)(3)	1. Are updates resulting from a change in the applicant's marital status prohibited?	_____	yes___no___
668.55(a)(1)(ii) 668.55(d)(1)	K. Do the institution's procedures ensure that all applicants, whether selected for verification or not, update dependency status throughout the award year?	_____	yes___no___

GENERAL PROVISIONS

Reference	Question	Responsible Office	Response
668.55(a)(3)	1. Are updates resulting from a change in marital status prohibited?	_____	yes___no___
1998-99 Verification Guide, p. 44	2. Are updates to household size and number in college for non-selected applicants prohibited?	_____	yes___no___
668.55(c)(2) 1998-99 Verification Guide, p. 47	L. If the EFC changes as a result of updating, are aid amounts adjusted to avoid overawards?	_____	yes___no___
668.55(c)(1)	1. Even if no adjustment is needed to avoid overawards, does the institution use the recalculated EFC for any new awards?	_____	yes___no___
668.58(a)(1)	M. Does the institution withhold disbursement of all Title IV funds and Federal Stafford Loan certification whenever it has reason to believe that application information is inaccurate?	_____	yes___no___
668.58(a)(2)	N. If the institution exercises an interim payment or loan certification option, does it have procedures to ensure that interim payments occur only if there is no conflicting information about application data?	_____	yes___no___ n/a___
668.58(a)(2)(ii)(A)	1. Are interim disbursements of Federal Pell Grant, Federal Perkins Loan, Federal Direct Loan, or FSEOG funds limited to the first payment period?	_____	yes___no___ n/a___
668.58(b) 668.61(a)	a. Does the institution assume liability for any overpayment resulting from interim disbursements that are not recovered from the student?	_____	yes___no___ n/a___
668.61(a)(2)(ii)	i. Is restitution made by the earlier of the end of the award year or 60 days after the applicant's last day of attendance?	_____	yes___no___ n/a___
668.58(a)(2)(ii)(B)	2. Is interim employment under FWS limited to 60 consecutive days?	_____	yes___no___ n/a___
668.58(a)(2)(iii)(B)	3. Is a procedure in place to hold Federal Stafford or Direct Loan proceeds until verification is complete?	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
	a. Are proceeds returned to the lender or servicer if verification remains incomplete? *NOTE: Although the 1998-99 Verification Guide indicates that FFEL loan proceeds must be returned within 10 days if received by EFT/master check, or 30 days if received by individual check , the General Provisions regulations allow proceeds to be held for up to 45 days, regardless of method of disbursement. Department of Education officials have confirmed for NASFAA that the regulation remains in effect.*	_____	yes___no___ n/a__
668.58(d)(1) 668.61(b)	b. If, upon verification, the applicant is eligible for less than the full amount of Federal Stafford certified or Federal Direct Loan originated, does the institution notify the lender to adjust subsequent disbursements?	_____	yes___no___ n/a___
668.58(d)(2) 668.61(b)	i. If the excess funds cannot be eliminated in subsequent disbursements for the applicable loan period, does the institution return the excess?	_____	yes___no___ n/a___
668.59(c)	O. If the applicant's EFC changes as a result of verification does the institution adjust aid to avoid overawards?	_____	yes___no___
668.59(a) 1998-99 Verification Guide, pp. 41-43	P. For Federal Pell Grant applicants, does the institution require reprocessing of corrected data when errors are outside the allowable tolerance or when recalculation shows that awards would decrease?	_____	yes___no___
668.59(b)(2)(ii)(A)	Q. Does the institution pay a student's Federal Pell Grant award based on the original EFC if verification shows increased eligibility but the corrected applicant data are not reprocessed?	_____	yes___no___
668.59(b)	1. If the institution wishes to pay an increased Federal Pell Grant award, does it require reprocessing?	_____	yes___no___
668.60(c)(1)	R. If a reprocessed SAR or ISIR is received after the student is no longer enrolled, but during the	_____	yes___no___

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Reference	Question	Responsible Office	Response
	90-day extension period, does the institution pay the lower of the original or reprocessed award? *NOTE: Previously, the student was required to complete verification by the earlier of 60 days after their last date of enrollment, or the date specified in the Federal Register. Beginning with the 1997-98 processing year, verification must be completed by the earlier of 90 days after the last date of enrollment, or the date specified in the Federal Register.*		
●FR, 6/9/97, p. 31488 ✦FR, 6/26/98, p. 34854			
1998-99Verification Guide, pp. 38-39	S. Does the institution indicate the proper status code when submitting Federal Pell Grant payment data?	_____	yes___no___
668.59(e)	T. Does the institution refer to ED applicants who received funds based on information suspected of being inaccurate when efforts to resolve the possible discrepancy have failed?	_____	yes___no___
DCL GEN-97-2 DCL GEN-96-18	U. Is the institution familiar with allowable modifications of the verification provisions for victims of specified recent natural disasters?	_____	yes___no___
Refunds and Repayments			
668.22(a)(1)	A. If a student withdraws, drops out, or is expelled on or after the first day of classes, does the institution have a fair and equitable refund policy under which it refunds unearned institutional charges to the Title IV recipient (including students whose parents received a PLUS loan on their behalf)?	_____	yes___no___
668.22(j)(1)(i)	B. Does the institution use as the student's withdrawal date the earlier of: ▸ the date the student notifies the institution of the student's withdrawal or the date of withdrawal as specified by the student, whichever is later; or ▸ the last recorded date of class attendance if the student drops out without notifying the institution?	_____	yes___no___
668.22(j)(1)(i)	1. Does the institution document the last recorded date of class attendance?	74_____	yes___no___

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Reference	Question	Responsible Office	Response
668.22(j)(1)(ii)	C. Does the institution use as the student's withdrawal date the last recorded date of the student's class attendance for students who: ▸ do not return from an approved leave of absence; or ▸ take a leave of absence that does not meet regulatory criteria?	_____	yes___no___
668.22(j)(1)(ii)	1. Does the institution document the last recorded date of class attendance?	_____	yes___no___
668.22(j)(3)	D. Does the institution determine a student's unofficial withdrawal date within 30 days after the earlier of the expiration of: ▸ the period of enrollment for which the student has been charged; ▸ the academic year in which the student withdrew; or ▸ the educational program from which the student withdrew?	_____	yes___no___
668.22(j)(1)(iii)	E. For students enrolled in educational programs that consist predominantly of correspondence courses, does the institution use as the student's withdrawal date the date that the last lesson was submitted by the student?	_____	yes___no___
668.22(j)(1)(iii)	1. If the institution restores to "in school" status students who (within 60 days of the date the last lesson was submitted) request to continue in the program, does the institution ensure that no more than one restoration to "in school" status is granted to a student on this basis?	_____	yes___no___
668.22(a)(2)	F. If the student does not follow the institution's published procedures for obtaining a refund, does the institution nonetheless return the portion of the refund allocable to the Title IV programs?	_____	yes___no___
668.22(g)(3)(iii)	G. For Title IV loan recipients, does the institution exercise the option of not paying refunds of $25 or less only for students who authorized the institution, in the enrollment agreement, to retain	_____	yes___no___ n/a___

Reference	Question	Responsible Office	Response
	any refund amount that would otherwise have been allocated to the Title IV loan programs?		
668.22(b)(1) 1998-99 FSFA Handbook, p. 3-80	H. For Title IV recipients, does the institution refund an amount that is at least the largest of the amount provided under: ▸ the requirements of state law or legally enforceable regulations promulgated by a state agency, if applicable; ▸ the standards of the institution's nationally recognized accrediting agency, if approved by ED; or ▸ the pro rata refund calculation, when applicable?	_____	yes___no___
668.22(b)(1)(iii)	1. Does the institution calculate a pro rata refund for all first-time students [as defined in 668.22(c)(7)] who withdraw on or before the 60% point in time [as defined in 668.22(b)(2)] in the period of enrollment for which the student has been charged [as defined in 668.22(e)]?	_____	yes___no___
668.22(c)(1)	2. For pro rata refunds, does the institution calculate the refund by applying to institutional charges a percentage equal to the percentage of the enrollment period for which the student has been charged *that remains* on the student's withdrawal date, rounded down to the nearest 10%?	_____	yes___no___
668.22(c)(8)(i)	a. For programs measured in credit hours: does the institution calculate the percentage that remains by dividing the number of weeks in the period of enrollment for which the student was charged into the number of weeks remaining in that period as of the withdrawal date?	_____	yes___no___ n/a___
668.22(c)(8)(ii)	b. For programs measured in clock hours: does the institution calculate the percentage by dividing the number of clock hours in the period of enrollment	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
	for which the student was charged into the number of scheduled clock hours remaining to be completed in that period as of the student's withdrawal date?		
668.22(c)(8)(iii)	c. For programs consisting predominantly of correspondence courses: does the institution calculate the percentage by dividing the number of lessons comprising the period of enrollment for which the student was charged into the number of lessons not submitted?	_____	yes___no___ n/a___
668.22(b)(1)(iv) 1998-99 FSFA Handbook, p. 3-81	I. When the student is not subject to the pro rata refund calculation, and no state or ED-approved accrediting agency standards exist, does the institution calculate and provide for a refund to the student that is at least the larger of the amount provided under: ▸ the Federal refund calculation; or ▸ the institution's refund policy?	_____	yes___no___ n/a___
668.22(b)(3)	J. Does the institution have a method for determining which refund policy or policies apply to a particular student who withdraws from school, and which provides the largest refund for that student?	_____	yes___no___
668.22(c)(3) 668.22(g)(2)(iii) 1998-99 FSFA Handbook, p. 3-88	K. Does the institution compute the unpaid amount of a student's scheduled cash payment by subtracting the amount paid by the student for the period of enrollment for which the student was charged from the student's scheduled cash payment?	_____	yes___no___
668.22(c)(2)(i) 668.22(g)(2)(ii)	1. If the institution chooses to make late disbursements, is the scheduled cash payment reduced by anticipated late disbursements of Title IV or state aid?	_____	yes___no___
668.22(c)(2)(iii) 668.22(g)(2)(ii)	a. If the late disbursement of state aid is not made with 60 days after the student's withdrawal date, does the institution recalculate the student's refund amount, adjusting the unpaid charges to exclude late state aid, and	_____	yes___no___

Reference	Question	Responsible Office	Response
	return any additional refund amount due as a result of the recalculation?		
668.22(c)(1)	2. For students subject to the pro rata refund calculation, does the institution subtract from the calculated pro rata refund amount the unpaid amount of the student's scheduled cash payment?	_____	yes___no___
668.22(b)(4) 668.22(g)(2)(iii)	3. For all refund calculations other than pro rata and state policies, does the institution subtract the unpaid amount of the student's scheduled cash payment from the amount of institutional charges the institution has calculated it may retain?	_____	yes___no___
668.22(g)(2)(iv)	L. For non-pro rata refunds, if the unpaid portion of the scheduled cash payment is greater than or equal to the amount the institution has calculated it may retain, does the institution return all Title IV program funds (other than FWS) used to pay institutional charges?	_____	yes___no___
668.22(a)(3)	M. For pro rata and Federal refund calculations, if the institution excludes the cost of equipment that is unreturnable or is not returned in good condition, can the institution substantiate that the costs for these items are reasonably related to the cost of providing them to the student?	_____	yes___no___
668.22(c)(5)(ii) 668.22(d)(3)(ii)	N. Before excluding the cost to the institution of returnable equipment from the calculation of pro rata or Federal refunds, does the institution allow a student at least 20 days from the withdrawal date to return the equipment?	_____	yes___no___
668.22(c)(5)(ii) 668.22(d)(3)(ii)	1. Does the institution exclude only equipment that it identified to the student (in writing prior to the student's enrollment) as returnable within 20 days, and that the student did not return in reasonably good condition?	_____	yes___no___
668.22(c)(5)(iii) 668.22(d)(3)(iii)	2. Does the institution ensure that it does not delay the return of the refund amount to the appropriate program account or accounts, the lender, and/or the individual within the specified time frames, regardless of when a student returns equipment?	_____	yes___no___

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Reference	Question	Responsible Office	Response
668.22(d)(2)	O. If the institution excludes an administrative fee from the institutional charges used to calculate pro rata and Federal refunds, is the amount of that fee the lesser of $100 or 5% of tuition, fees, room and board, and other institutional charges assessed the student?	_____	yes___no___
668.22(c)(6)(i) 668.22(d)(4)(i)	P. Does the institution exclude room charges from the calculation of pro rata and Federal refunds only if the charges are "passed through" the institution to an entity that is not under the control of, related to, or affiliated with the institution?	_____	yes___no___
668.22(c)(6)(ii) 668.22(d)(4)(ii)	Q. Does the institution exclude from pro rata and Federal refund calculations any fees for group health insurance only if this insurance is required for all students and the coverage remains in effect throughout the period for which the student was charged?	_____	yes___no___
668.22(g)(1)(i)	R. If a student who received Title IV assistance, other than FWS, is owed a refund of institutional charges, does the institution ensure that a portion of the refund is returned to the Title IV programs?	_____	yes___no___
668.22(h)(1),(2)	1. Does the institution allocate the Title IV portion to the programs in the order specified by regulation in all cases?	_____	yes___no___
668.22(g)(1)(ii)	2. Does the institution ensure that no program is refunded more than the amount that the student received from that program?	_____	yes___no___
668.22(h)(2)(i)	3. Does the institution ensure that no portion of a refund is allocated to FWS?	_____	yes___no___
668.22(h)(2)(iii) 682.607(c)(1)	S. Does the institution return to the lender any refund allocated to the Federal Stafford or Federal PLUS loan programs within 60 days of the date the student officially withdraws, is expelled, or the institution determines that the student has unofficially withdrawn?	_____	yes___no___
682.607(c)(2)	1. If the student does not return at the expiration of an approved leave of absence, does the institution return to the lender any refund allocated to the Federal Stafford or	_____	yes___no___

Reference	Question	Responsible Office	Response
	Federal PLUS loan programs within 30 days of the earlier of: ▸ the date the leave expires; or ▸ the date the student notifies the institution that the student will not return at the expiration of the leave?		
682.607(a)(2)	a. When FFEL funds are returned to the lender as part of the refund process, does the institution simultaneously send the borrower written notification that the refund was sent to the lender?	_____	yes___no___
668.22(h)(2)(iv)	T. Does the institution return the portion of the student's refund allocated to the Federal Pell Grant, FSEOG, Federal Perkins, and/or Direct Loan programs to the appropriate program account within 30 days of the date that the student officially withdraws, is expelled, or the institution determines that the student has unofficially withdrawn?	_____	yes___no___
685.306(a)(2)	1. If Direct Loan funds are returned as part of the refund process, does the institution simultaneously send the borrower written notification that it has refunded loan proceeds to the program account?	_____	yes___no___
668.22(j)(4)(i)	U. If the student officially withdrew or was expelled, does the institution refund any amount due the student directly within 30 days of the student's withdrawal date?	_____	yes___no___
668.22(j)(4)(ii)	V. If the student unofficially withdrew (dropped out), does the institution refund any amount due the student directly within 30 days of the earliest of: ▸ the date on which the institution determines that the student dropped out; ▸ the expiration of the academic term in which the student withdrew; or ▸ the expiration of the period of enrollment for which the student was charged?	_____	yes___no___

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Reference	Question	Responsible Office	Response
668.22(j)(4)(iii)	W. If a student does not return to the institution at the expiration of an approved leave of absence, does the institution refund any amount due the student directly within 30 days of the earlier of: ▸ the date the leave of absence expires; or ▸ the date the student notifies the institution that the student will not return?	_____	yes___no___
668.22(j)(4)(iii)(B)	X. If the student takes an unapproved leave of absence, does the institution refund any amount due the student directly within 30 days after the student's last recorded date of documented class attendance?	_____	yes___no___
668.22(f)(1)	Y. If a student who received Title IV funds *other than FWS, FFEL, or Direct Loan* withdraws, drops out, or is expelled on or after the first day of class, does the institution determine whether the student received an overpayment for non-institutional costs for the enrollment period for which the student was charged?	_____	yes___no___
668.22(f)(2); 1998-99 FSFA Handbook, p. 3-97	1. In determining whether the student has received an overpayment, does the institution consider only non-institutional costs that the student incurred up to the time of withdrawal?	_____	yes___no___
668.22(f)(2)(i)	a. Does the institution exclude from the repayment calculation any amounts the student received from the FWS, FFEL, or Direct Loan programs?		
668.22(g)(3)(i)	Z. If the student received an overpayment of aid for non-institutional costs, does the institution make every reasonable effort to recover the overpayment from the student?	_____	yes___no___
668.22(g)(3)(iii)	1. If the amount of the student's overpayment is less than $100, does the institution consider the student not to have received an overpayment, and take no further action?	_____	yes___no___
668.22(h)(1),(2)	AA. When a student repays an overpayment, does the institution allocate that repayment	_____	yes___no___

Reference	Question	Responsible Office	Response
	to the programs in the order specified by regulation in all cases?		
668.22(h)(2)(i),(ii)	1. Does the institution ensure that no part of a repayment is allocated to the FWS, FFEL, or Direct Loan programs?	_____	yes___no___
668.22(g)(3)(ii)	2. Does the institution ensure that the repaid amount distributed back to an aid program does not exceed the amount the student received from that program?	_____	yes___no___
668.22(h)(2)(v)	3. Does the institution return the portion of the student's repayment allocated to the Federal Pell Grant, FSEOG, or Federal Perkins program within 30 days of the date that the student repays the overpayment?	_____	yes___no___
668.21 674.16(f) 676.16(d) 690.78(b)	BB. Does the institution return to the appropriate program account **all** Federal Pell Grant, FSEOG, or Federal Perkins Loan funds that were disbursed to a student and/or credited to the account of a student: ▸ who withdraws, drops out, or is expelled *before* the first day of classes; or ▸ for whom the institution cannot document attendance in any class?	_____	yes___no___
682.604(d)(3)	CC. For a registered student who withdraws or is expelled before the first day of class of an enrollment period, does the institution return FFEL proceeds to the lender?	_____	yes___no___
682.604(d)(3)	1. If the FFEL proceeds are received but not disbursed, does the institution return the proceeds to the lender no later than the period specified in 668.167(b)?	_____	yes___no___
682.604(d)(4)	2. For a registered student for whom the institution cannot, for any other reason, document any class attendance, does the institution return to the FFEL lender: ▸ proceeds credited to the student's account; and	_____	yes___no___

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Reference	Question	Responsible Office	Response
	▸ payments made by the student to the institution to the extent that they do not exceed the amount of proceeds delivered to the student?		
682.604(d)(4)	a. Are proceeds returned within 30 days of the student's withdrawal date?	_____	yes___no___
685.303(b)(3)	DD. For a registered student who withdraws or is expelled before the first day of class of an enrollment period, or who fails to attend during that period, or for whom the institution cannot, for any other reason, document any class attendance, does the institution return to the Direct Loan servicer:	_____	yes___no___
	▸ proceeds credited to the student's account; and		
	▸ payments made by the student to the institution to the extent that they do not exceed the amount of proceeds delivered to the student?		
685.303(b)(3)	1. Are the proceeds returned within 30 days of the student's withdrawal date?	_____	yes___no___
682.604(d)(4) 685.303(b)(3)	EE. Does the institution notify the FFEL lender or Direct Loan servicer, within 30 days of the student's withdrawal date, of the student's withdrawal, expulsion, or failure to attend?	_____	yes___no___

Comments on Compliance with Title IV General Provisions _____

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II. Federal Pell Grant Program

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
1998-99 FSFA Handbook, p. 4-5	A. If the institution enrolls incarcerated students, does it:		
	1. Consider as eligible only students incarcerated in local penal institutions (regardless of the jurisdiction that convicted them), or in private penal institutions under contract with local government entities?	_____	yes___no___ n/a___
	2. Consider as ineligible students incarcerated in Federal or State penal institutions, or in private penal institutions operated under contract with Federal or State governments?	_____	yes___no___ n/a___
690.6(a) 690.75(a)(1),(2) 690.2, *Undergraduate student*	B. Does the institution ensure that Federal Pell Grants are awarded only to eligible undergraduate students who do not yet have a baccalaureate or first professional degree?	_____	yes___no___
690.6(b) 1998-99 FSFA Handbook, p. 4-4	1. Does the institution determine when a student is considered to have completed the baccalaureate course of study?	_____	yes___no___
690.6(b)	a. Does the institution exclude from this determination any noncredit or remedial courses and courses in English as a Second Language instruction?	_____	yes___no___
1998-99 FSFA Handbook, p. 4-57	C. Is the institution aware that students who are enrolled less than half-time are eligible to receive Federal Pell Grants, and that the institution does not have the discretion to deny payment to an eligible student who is enrolled less than half-time?	_____	yes___no___
690.11	D. Upon learning that a student is concurrently attending another institution, does the institution ensure that the student does not receive Federal Pell Grants from both institutions?	_____	yes___no___
	1. Does the institution attempt to resolve potential overaward situations upon receipt of a letter from ED that indicates one of its students may have received grants from more than one institution in an award year in excess of the student's eligibility?	_____	yes___no___

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FEDERAL PELL GRANT

Reference	Question	Responsible Office	Response
690.61(a)(1)	E. Does the institution pay only on valid SARs or ISIRs?	_____	yes___no___
690.61(a)(1)(ii)	1. Does the institution pay an eligible student's Federal Pell Grant on the basis of a valid ISIR whether or not the student submits a paper SAR?	_____	yes___no___
690.2, *Valid ISIR* and *Valid SAR* 1998-99 FSFA Handbook, p. 4-7	2. Is the institution aware of the current signature requirements, which do not require a valid SAR or ISIR to be signed by the student, whether it is a first transaction or a subsequent transaction resulting from corrections based on signed documentation?	_____	yes___no___
690.61(b) FR, 06/09/97, p. 31488	3. When enforcing the receipt deadline for SARs and ISIRs, does the institution use the earlier of: ▸ the student's last day of attendance; or ▸ the deadline date established by the Secretary through a Notice published in the Federal Register (August 31, 1998 for 1997-98)?	_____	yes___no___
668.60(c) 668.164(g) ●FR, 06/09/97, p. 31488 ◆FR, 6/26/98, p. 34855	a. When verification is required, does the institution accept corrected SARs/ISIRs until the extended deadline announced by ED (●60/◆90 days after the student's last date of enrollment or August 31, which ever is earlier)? *NOTE: Previously, the annual deadline required that a corrected SAR/ISIR be received by the institution no later than 60 days after the student's last date of attendance (LDA). Beginning with the 1998-99 processing year, verification must be completed by the earlier of 90 days after the last date of enrollment, or the date specified in the Federal Register.*	_____	yes___no___
668.60(c)(1)	i. Is the institution aware that the student cannot use the verification extension to increase eligibility?	_____	yes___no___
FR, 11/1/94,	F. If the institution submits application data through	_____	yes___no___

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Reference	Question	Responsible Office	Response
pp. 54719, 54721 690.12(b)(1)	EDE, does it ensure that the application (or printout of the information entered on an electronic application) is signed by the student and, for a dependent student, by at least one parent prior to transmission?		n/a___
690.14(c)(1)	1. If the institution transmits corrections through EDE, does it ensure that the corrections documentation is properly signed?	_____	yes___no___ n/a___
FR, 11/1/94, p. 54721	a. Does the institution review the ISIR generated by the transmitted corrections to ensure that the information accurately reflects the correction documentation?	_____	yes___no___ n/a___
690.82(b)	2. Does the institution retain the signed application and signed correction documents to support EDE transmissions, even if the student never actually attends that institution?	_____	yes___no___ n/a___
668.24(d)(3) 1998-99 FSFA Handbook, p. 4-7	a. Is the institution aware that it may store ISIRs in electronic format, rather than printing and storing paper?	_____	yes___no___ n/a___
690.64(a)	G. When a payment period encompasses July 1, does the institution assign the entire payment period to only one award year?	_____	yes___no___
1998-99 FSFA Handbook, p. 4-37	1. Regardless of whether the institution assigns the crossover period to a particular award year in all cases, or determines the award year on a student-by-student basis, does it ensure that it has a valid SAR or ISIR for the student for the award year selected?	_____	yes___no___
1998-99 FSFA Handbook, p. 4-57	2. Does the institution understand that it may not deny payment to a student who has eligibility under the institution's policies regarding assignment of a crossover period to an award year, just because the payment period occurs during the summer?	_____	yes___no___
1998-99 FSFA Handbook, p. 4-40	3. Is the institution aware that it may choose whether to combine multiple summer mini-sessions into a single term??	_____	yes___no___
1998-99 FSFA	a. If the institution treats individual	_____	yes___no___

Reference	Question	Responsible Office	Response
Handbook, p. 4-40	summer mini-sessions as separate terms, does it use Formula 3 to calculate Federal Pell Grant payments for all terms in the award year?		
1998-99 FSFA Handbook, p. 4-40	b. If the institution combines summer mini-sessions into a single term, does it determine enrollment status for that payment period based on either: • the total number of credits the student is taking for all mini-sessions, if that number is known; or • a projected number based on the credits the student is taking for the first session, if the total for all mini-sessions is not known?	_____	yes___no___ n/a___
1998-99 FSFA Handbook, p. 4-40	i. Does the institution recalculate the award if the student does not ultimately begin attendance in all classes (in all mini-sessions) used to determine enrollment status?	_____	yes___no___
1998-99 FSFA Handbook, pp. 4-15, 4-38	H. Does the institution use the same definition of full-time (and consequently half-time) for all Title IV programs for students in the same academic program, ensuring that its definition of full-time meets the requirements of the applicable Federal Pell Grant formula, regardless of the definition used by the institution's registrar?	_____	yes___no___
1998-99 FSFA Handbook, p. 4-16	1. For non-standard terms, is the number of credit hours used to define full-time status rounded up to the next whole number, if the Formula 3 calculation results in a fraction?	_____	yes___no___ n/a___
668.4(b) 690.66(b)(1)	I. Does the institution have a written definition (consistent with regulatory criteria) of payment periods for each eligible non-term program?	_____	yes___no___ n/a___
668.4(b)(3)	1. If a student cannot earn half of his or her credits in the program or in the academic year (depending on which must be used to define the non-term payment period) until after the midpoint between the first and last scheduled days of class, does the institution	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
	consider the student to begin his or her second payment period on the later of: ▸ the calendar midpoint between the first and last scheduled days of class of the program or academic year; or ▸ the date that the student completed half of his or her academic coursework?		
690.75(a)(3) 668.4(b)(1),(2)	2. Does the institution withhold subsequent payments until the student has completed: ▸ the clock hours for which he or she has been paid, if the student's program is measured in clock hours; or ▸ the credit hours for which he or she has been paid, if the student's program is measured in credit hours and does not have academic terms?	_____	yes___no___ n/a___
1998-99 FSFA Handbook, p. 4-19	J. When calculating awards, does the institution always use a cost of attendance (COA) based on full-time, full academic year attendance, which complies with statutory requirements?	_____	yes___no___
1998-99 FSFA Handbook, p. 4-19	1. For less-than-half-time students, does the cost of attendance reflect full-time, full-year amounts only for those cost components that are allowable for less-than-half-time status?	_____	yes___no___
1998-99 FSFA Handbook, pp. 4-19 - 4-22	2. Have costs for programs or enrollment periods longer or shorter than an academic year been prorated for Federal Pell Grant purposes so that they represent the costs for a full academic year?	_____	yes___no___ n/a___
	a. Does the institution use one of the two allowable methods to prorate the COA so that it represents the costs for full a academic year?	_____	yes___no___ n/a___
	i. If the institution chooses to prorate all of the costs of attendance by one fraction, does it multiply those costs by the lesser of:	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
	▸ weeks of instructional time in the academic year / weeks of instructional time for which those costs apply or, ▸ credit/clock hours in the academic year / credit/clock hours for which the costs apply		
1998-99 FSFA Handbook, pp. 4-22 - 4-23	ii. If the institution chooses to split the costs of attendance into costs associated with credit/clock hours and costs associated with weeks:		
	▸ are costs associated with time (i.e., room, board, miscellaneous personal, transportation, dependent care, study abroad, disability-related, and cooperative education expenses) prorated on the basis of *weeks of instruction* in the academic year?	_____	yes___no___ n/a___
	▸ are costs associated with credit or clock hours (i.e., tuition, fees, books and supplies, and loan fees, if applicable) prorated on the basis of *hours* in the academic year?	_____	yes___no___ n/a___
690.62(a) 690.63(b)(2), (c)(2), (d)(2), (e)(1) 690.66(a)(1)	K. Does the institution use the Payment Schedule to determine annual awards for full-time students, and for part-time students in clock-hour or non-term credit-hour programs, and the appropriate Disbursement Schedule to determine the annual award for part-time students in term-based programs?	_____	yes___no___
●DCL POL-97-1 ◆DCL P-98-2	i. ◆Does the institution use the alternate Federal Pell Grant Schedules for students with tuition charges of less than $150? *NOTE: In cases when tuition is less than $150, institutions may be required to use the alternate payment schedules because a provision of the Higher Education Act*	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
	requires an alternate calculation when the maximum Federal Pell Grant award exceeds $2,400.		
690.63(a)	L. Is the student's Federal Pell Grant entitlement computed correctly based on the student's 9-month EFC, full-year cost of attendance, length of the period of enrollment, and the school's academic year definition, by using the appropriate calculation formula listed below? *NOTE: If ED has granted the institution permission to use less than 30 weeks of instructional time in its definition of an academic year, the approved number of weeks is substituted for 30 in the criteria listed below.*	_____	yes___no___
690.63(a)(1)	1. Formula 1 (or Formula 3) for a standard-term, credit-hour program which: ▸ defines full-time as at least 12 credit hours in each term during the award year (including summer); ▸ does not have overlapping terms; ▸ uses an academic calendar which includes 2 semesters, 2 trimesters, or 3 quarters, covering *at least* 30 weeks of instructional time, in a fall through spring time frame.		
690.63(a)(2)	2. Formula 2 (or Formula 3) for a standard-term, credit-hour program which: ▸ defines full-time as at least 12 credit hours in each term during the award year (including summer); ▸ does not have overlapping terms; ▸ uses an academic calendar which includes 2 semesters, 2 trimesters, or 3 quarters, covering *less than* 30 weeks of instructional time, in a fall through spring time frame.		
690.63(a)(3)	3. Formula 3 for any term-based, credit-hour program that does not meet *all* of the		

Reference	Question	Responsible Office	Response
	conditions for Formula 1 or Formula 2.		
690.63(a)(4)	4. Formula 4 for any clock-hour program or for a credit-hour program without terms.		
690.63(a)(5) 690.66(d)	5. Formula 5A for non-term correspondence programs or Formula 5B for term-based correspondence programs (*non-residential* components; for residential components, Formula 3 or Formula 4 is used).		
690.63(f)	M. Does the institution ensure that no single disbursement of Federal Pell Grant funds under Formula 3 or 4 exceeds 50% of the student's annual award?	_____	yes___no___ n/a___
	1. If the amount calculated for a payment period exceeds 50% of the annual award, does the institution:		
	a. make at least two disbursements within the payment period?	_____	yes___no___ n/a___
	b. ensure that no more than 50% of the annual award is disbursed before the student completes 50% of the weeks of instructional time in the program's academic year?	_____	yes___no___ n/a___
690.63(g)(1)	N. Does the institution ensure that a student's total Federal Pell Grant disbursements for the award year do not exceed his/her Scheduled Federal Pell Grant Award for that award year?	_____	yes___no___
690.67	1. If ED has announced in the *Federal Register* that institutions may pay a student up to a second Scheduled Federal Pell Grant in an award year, does the institution pay from second awards only students accelerating their studies in an associate or bachelor's degree program?	_____	yes___no___ n/a___
690.65(c)	2. Does the institution adjust the award when necessary to prevent a transfer student from exceeding his/her scheduled Federal Pell Grant for that award year?	_____	yes___no___
690.65(d),(e)	a. If a transfer student's new Scheduled Pell Grant differs from the Scheduled	_____	yes___no___

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Reference	Question	Responsible Office	Response
	Pell Grant for the same award year at the institution from which he/she transferred, does the institution calculate the student's maximum entitlement based on the unutilized *percentage* of the Scheduled Award?		
690.80(a)(1)	O. Does the institution understand when it must recalculate a student's Federal Pell Grant award, and have procedures in place to identify students for whom recalculation is required?	_____	yes___no___
	1. If the student's expected family contribution (EFC) changes at any time during the award year, does the institution recalculate the award for the entire award year?	_____	yes___no___
690.80(a)(2)	a. Are resultant under- or overpayments corrected, except for underpayments that result from verification if the corrected SAR/ISIR is received after the initial submission deadline (i.e., during the verification extension)?	_____	yes___no___
690.80(b)(1)	2. If the student's enrollment status changes from one academic term to another within the same award year, does the institution recalculate the award (taking into account any changes in cost of attendance) for the new payment period?	_____	yes___no___
690.80(b)(2)(ii)	3. If the student's enrollment status changes *within* the payment period *before* the student begins attendance in all classes, does the institution recalculate the award (taking into account any changes in cost of attendance) to reflect only those classes for which the student actually began attendance?	_____	yes___no___
	P. Has the institution established policies regarding optional recalculation of Federal Pell Grants?	_____	yes___no___
690.80(b)(2)(i) 1998-99 FSFA Handbook, p. 4-66	1. If the institution's policy is to recalculate awards when a student's enrollment status changes *within* a payment period *after* the student has begun attendance in all classes, is this policy applied consistently to all students, at any time during the payment	_____	yes___no___ n/a___

Reference	Question	Responsible Office	Response
	period, whether the adjustment causes the award to increase *or* decrease?		
690.80(c) 1998-99 FSFA Handbook, p. 4-67	2. If the institution's policy is to recalculate awards when a student's cost of attendance (COA) changes at any time within the award year but enrollment status remains the same, is the policy applied consistently to all students, whether the adjustment causes the award to increase *or* decrease?	_____	yes___no___ n/a___
1998-99 FSFA Handbook, p. 4-68	a. Is recalculation performed only for payment periods that are affected by the change in cost?	_____	yes___no___ n/a___
1998-99 FSFA Handbook, p. 4-68	b. Does the institution understand that it may establish a policy that differentiates between changes in COA that occur *within* a payment period and changes that occur *between* payment periods?	_____	yes___no___
690.75(a) 1998-99 FSFA Handbook, p. 4-57	Q. Does the institution confirm that students continue to meet eligibility criteria before paying a Federal Pell Grant for a payment period?	_____	yes___no___
668.164(g)(2)(i)(D),(g)(3)(i)	R. If the institution receives a valid SAR or ISIR while a student is eligible but that student becomes ineligible before receiving payment, does the institution pay only the amount that it determines could have been used for educational purposes before the student became ineligible?	_____	yes___no___ n/a___
690.78(c)(6) 668.164(g)(3)(ii)	1. Does the institution make late disbursements of Federal Pell Grants no later than 90 days after students become ineligible?	_____	yes___no___ n/a___
690.76(b) 1998-99 FSFA Handbook, p. 4-58	S. If the institution pays a student retroactively for a completed payment period within the award year, is payment based on hours *completed* by the student for that payment period (in determining enrollment status)?	_____	yes___no___
690.78(c)(2)	T. If a student does not pick up a disbursement check on time, does the institution still pay the student if he or she requests payment within 20 days after the last date that his or her enrollment ends in that award year?	_____	yes___no___
668.78(c)(5)	1. Does the institution understand that, if the	_____	yes___no___

Reference	Question	Responsible Office	Response
	student does not pick up the check by the end of that period, it has the *option* of paying the student through the next payment period?		
690.79(a)(2) 1998-99 FSFA Handbook, p. 4-69	U. Is the institution aware of its obligation to refund any overpayment resulting from incorrect use of the Federal Pell Grant Payment or Disbursement Schedules or failure to follow other program procedures, regardless of whether they are able to collect the overpayment from the affected student?	_____	yes___no___
1998-99 FSFA Handbook, p. 4-70	1. Is the institution aware that if it refunds an overpayment on behalf of a student, that the student is no longer considered to owe an overpayment, and is eligible to receive further Title IV aid?	_____	yes___no___
668.35(c)	2. Is the institution aware that any student who received an overpayment may continue to receive Title IV aid if he or she makes repayment arrangements that are satisfactory to the institution?	_____	yes___no___
1998-99 FSFA Handbook, p. 4-70	V. Does the institution understand that it may not eliminate Federal Pell Grant overpayments from a prior award year by adjusting the student's payments for the current award year?	_____	yes___no___
690.79(b)(1)	W. Does the institution assist ED in collecting overpayments from students even when the overpayment is not the institution's fault?	_____	yes___no___
690.79(b)(2) 1998-99 *Verification Guide*, p. 51	1. Does the institution report student liability for overpayments to ED when it is unable to collect or resolve the overpayment?	_____	yes___no___
690.83(a)	X. Does the institution report payment data to the Department of Education in one of the formats ED prescribes and by the dates ED specifies?	_____	yes___no___
690.83(b)(1)	1. Does the institution report any change in enrollment status, cost of attendance, or other factor that causes a change in the amount of Federal Pell Grant for which a student qualifies by the end of the reporting period that next follows the reporting period in which the change occurred?	_____	yes___no___

Reference	Question	Responsible Office	Response
1998-99 FSFA Handbook, p. 4-86	a. Does the institution report situations in which previously reported anticipated payments for subsequent payment periods are not made?	_____	yes___no___
690.82(a)	Y. Does the institution follow the record retention and examination requirements outlined in Subpart B of the General Provisions regulations for each student who received a Federal Pell Grant?	_____	yes___no___
690.10(b)	Z. Are administrative cost allowances used solely for the institution's costs of administering the Federal Pell Grant, FSEOG, FWS, and Federal Perkins Loan programs?	_____	yes___no___
690.10(c)	1. If the institution enrolls a significant number of less than full-time students or independent students, does the institution use a reasonable proportion of the funds for financial aid services during times and places that will most effectively accommodate the needs of these students?	_____	yes___no___ n/a___

Other Recommended Good Practices for the Administration of the Federal Pell Grant Program

Practice	Comments
1. If corrections are not submitted electronically, the institution should monitor SARs that are corrected as a result of verification when they are resubmitted.	
2. When processed payment data are returned from the Department of Education, they should be reviewed to determine whether further action is needed.	
3. The institution should reconcile Student Payment Summaries carefully with its records of the individual payments made and reported.	
4. If a corrected Institutional Payment Summary is received from ED, the corrections should be verified before the next report is transmitted, and appropriate action should be taken to reconcile disbursements and institutional records.	
5. If it does not do so at present, the institution should consider establishing consortium agreements with other institutions where its students may be enrolled for one or more courses, to enable those students to make maximum use of their Federal Pell Grant eligibility.	

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Comments on the Administration of the Federal Pell Grant Program

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III. Campus-Based Programs, Common Provisions

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
DCL GEN-93-3 1998-99 FSFA Handbook, p. 5-5	A. Does the institution require all applicants for campus-based funds to submit a FAFSA and receive an official EFC processed by the CPS?	_____	yes___no___
	1. If the institution recalculates the EFC to correct erroneous data, does it use only the Federal Methodology?	_____	yes___no___
674.10(c) 675.10(b) 1998-99 FSFA Handbook, p. 5-5	B. Does the institution have written policies and procedures describing the selection criteria for awarding campus-based funds?	_____	yes___no___
674.10(b) 675.10(c) 676.10(b)	C. Does the institution offer at least 5% of its FSEOG and FWS allocations and at least 5% of loans made under the Federal Perkins Loan Program to non-traditional students (i.e., part-time students and independent students) if: ▸ the allocation for the program (Federal Perkins, FSEOG or FWS) is directly or indirectly based in part on the financial need of non-traditional students; ▸ the total financial need of non-traditional students exceeds 5% of the total financial need of all of the institution's students; and	_____	yes___no___
1998-99 FSFA Handbook, p. 5-6	▸ for FSEOG or FWS, the allocation for the program is more than $5,000, or for Federal Perkins, the institution received new FCC for that award year?		
673.5(a),(b)	D. Before awarding campus-based funds does the institution consider all of the student's resources that it can reasonably anticipate, makes available, or knows about, in order to avoid exceeding the student's need?	_____	yes___no___
673.5(c)	1. Does the institution include as resources: Federal Pell Grant to which the student is entitled; FFEL loans not used to replace the expected family contribution (EFC); tuition/fee waivers; fellowships, assistantships, grants, or scholarships, including ROTC; insurance programs for the student's education; veterans benefits; net earnings from need-based employment;	_____	yes___no___

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Reference	Question	Responsible Office	Response
	long-term loans, including Federal Perkins and Direct Loans, made by the institution and not used to replace EFC?		
673.5(d)	E. Does the institution review a student's aid package when additional resources are received to determine if there is an overaward?	_____	yes___no___
673.5(d)	1. If a student receives additional resources, and the total resources including the financial aid awarded exceed the student's need by more than $300, does the institution adjust the student's financial aid package to prevent an overaward?	_____	yes___no___
1998-99 FSFA Handbook, p. 2-67	2. If the institution has received but not yet delivered Stafford loan proceeds, does the institution reduce the overaward by first returning the Stafford loan proceeds?	_____	yes___no___
673.6	F. Does the institution comply with requirements to coordinate campus-based funds with BIA grants, and revise awards only as specified by those requirements?	_____	yes___no___
DCL GEN-92-1	G. Does the institution coordinate awards with its local Office of Vocational Rehabilitation (VR) for disabled students eligible for VR assistance?	_____	yes___no___
673.7	H. Does the institution understand and follow federal regulations in calculating the administrative cost allowance?	_____	yes___no___
673.7(e)	I. Are administrative cost allowances used only to offset the costs of administering the campus-based and Federal Pell Grant programs (including expenses incurred in carrying out "Student Consumer Information Services" under 34 CFR Part 668 Subpart D)?	_____	yes___no___
HEA, Sec. 489	1. If the institution enrolls a significant number of part-time and independent students, does the institution use a reasonable portion of its administrative cost allowance to provide financial aid services at times and in places that most effectively accommodate their needs?	_____	yes___no___ n/a___

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CAMPUS-BASED PROGRAMS (COMMON)

Reference	Question	Responsible Office	Response
674.19(e)(1) 675.19(b) 676.19(b)	J. Does the institution keep intact and accessible records of the application, the receipt, and the expenditure of Federal funds, including all accounting records and original and supporting records necessary to document how the funds were spent?	_____	yes___no___
668.24(e)(i)	K. Does the institution keep its Fiscal Operations Report and Application to Participate (FISAP), and any records necessary to support the data contained in the FISAP, for three years after the end of the award year in which the FISAP was submitted?	_____	yes___no___
674.19(e)(1) 675.19(b)(1) 676.19(b)(1)	1. Does the institution keep records on any expenditure or claim questioned by Federal audit or program review until: the later of- ▸ the resolution of that questioned claim or expenditure; or ▸ the end of the retention period applicable to that record?	_____	yes___no___
674.19(e)(1) 675.19(b)(1) 676.19(b)(1)	2. If the institution keeps its records in computer format, does it maintain the source documents supporting the computer input in hard copy, microforms, computer file, optical disk, CD-ROM, other media format that is retrievable in a coherent hard copy, or in other media formats that are acceptable to the Secretary?	_____	yes___no___
674.19(d)(1) 675.19(b)(2)(iv) 676.19(b)(2) 668.24(c)	L. For each of the campus-based programs in which the institution participates, does it establish and maintain program and fiscal records that are reconciled at least monthly? *NOTE: Beginning in 1996-97, record retention requirements related to student records are located in the General Provisions Regulations.*	_____	yes___no___
674.19(d)(2) 675.19(b)(3) 676.19(b)(3)	M. Do the institution's accounting system and program records enable the accurate preparation and submission of Fiscal Operations Reports?	_____	yes___no___

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CAMPUS-BASED PROGRAMS (COMMON)

Reference	Question	Responsible Office	Response
	1. Is the report submitted by the date specified annually by the Department of Education?	_____	yes___no___
	2. Is the report submitted on the form specified by the Department of Education?	_____	yes___no___
674.16(b),(c), (g) 675.16(a)(1)(i) 676.16(a),(b),(e)	N. Does the institution observe the requirements for disbursing a portion of awarded funds in each payment period or, in the case of FWS, at least once a month?	_____	yes___no___
673.4(d)(3)	O. Is the institution aware that if more than 10% of its FWS, Federal Perkins Loan, or FSEOG allocation for an award year is returned to the Department of Education, the institution's allocation for that program for the second succeeding award year will be reduced by the dollar amount returned?	_____	yes___no___

Comments on the Administration of the Campus-based Programs _____

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IV. Federal Perkins Loan Program

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
674.10(a)(1)	A. Does the institution make Federal Perkins Loans reasonably available, to the extent of available funds, to all students, but give priority to students with exceptional need?	_____	yes___no___
674.10(a)(2)	1. Has the institution defined "exceptional need" for purposes of selecting Federal Perkins Loan recipients?	_____	yes___no___
674.9(d)	B. Does the institution ensure that it receives or makes a determination of eligibility or ineligibility for a Federal Pell Grant for undergraduate Perkins applicants?	_____	yes___no___
674.9(f)	C. Does the institution require applicants to provide their driver's license number, if any, at the time of applying for the loan? *NOTE: Driver's license numbers are currently collected on the FAFSA.*	_____	yes___no___
	D. Does the institution ensure that it considers for Federal Perkins Loan Program assistance:		
674.9(b)	1. students engaged in a program of study abroad approved for credit by the home institution?	_____	yes___no___
1998-99 FSFA Handbook, p. 6-5	2. students enrolled in an undergraduate program even if they have already received a baccalaureate or first professional degree?	_____	yes___no___
1998-99 FSFA Handbook, p.6-6	3. students enrolled at least half-time in teacher certification programs?	_____	yes___no___
674.9(e)	E. Does the institution deny Federal Perkins Loan funds to any student who evidences unwillingness to repay the loan?	_____	yes___no___
1998-99 FSFA Handbook, p. 6-7	1. Is the institution aware that prior bankruptcy may no longer be used as the sole basis for denying a loan?	_____	yes___no___
	F. Does the institution consider as ***ineligible*** for Federal Perkins loans:		

FEDERAL PERKINS LOANS

Reference	Question	Responsible Office	Response
1998-99 FSFA Handbook, p. 6-5	1. students serving in a medical internship or residency?	_____	yes___no___ n/a___
668.32(c)(2)(i)	2. incarcerated students?	_____	yes___no___ n/a___
674.9(g)	3. students whose previous Federal Perkins loan (Perkins, Direct, or Defense) was written off (if the amount of the write-off exceeded $25), unless the student reaffirms that loan?	_____	yes___no___
674.9(h)(1)	4. students whose previous loan was canceled due to total and permanent disability, unless the student obtains a physician's certification that the condition has improved and the borrower is able to engage in substantial gainful activity?	_____	yes___no___
674.9(h)(2)	a. Once the certification is obtained, does the institution require the student to sign a statement acknowledging that any new Federal Perkins Loan Program loan cannot be canceled on the basis of any present impairment, unless that condition substantially deteriorates?	_____	yes___no___
674.5(a)	G. Does the institution understand the effects of its default rate on its program funding?	_____	yes___no___
674.6(a)	1. If the institution's default rate requires it to implement a default reduction plan, does it adhere to the provisions of that plan?	_____	yes___no___
	H. Does the institution observe the appropriate annual award limits listed below:		
674.12(a)	1. For an institution not participating in the Expanded Lending Option (ELO): ▸ $3,000 per academic year for undergraduates; and ▸ $5,000 per academic year for graduate or professional students?	_____	yes___no___ n/a___

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FEDERAL PERKINS LOANS

Reference	Question	Responsible Office	Response
674.7(b)	2. For an institution participating in the Expanded Lending Option (ELO): ▸ $4,000 per academic year for undergraduates; and ▸ $6,000 per academic year for graduate or professional students?	_____	yes___no___ n/a___
	I. Does the institution observe the appropriate aggregate program limits listed below:		
674.12(b)	1. For a non-ELO institution: ▸ $15,000 for undergraduates; and ▸ $30,000 for graduate or professional students?	_____	yes___no___
674.7(c)	2. For an institution participating in the Expanded Lending Option (ELO): ▸ $8,000 for a student who has not successfully completed two years of a program leading to a bachelor's degree; ▸ $20,000 for a student who has successfully completed two years of a program leading to a bachelor's degree but who has not received the degree; and ▸ $40,000 for a graduate or professional student?	_____	yes___no___ n/a___
674.7(d) 674.12(c)	J. Is the institution aware that annual and aggregate limits may be exceeded by 20% for students enrolled in a program of study abroad approved by the home institution, if the program has reasonable costs in excess of the home institution's costs?	_____	yes___no___ n/a___
674.7(e) 674.12(d)	K. In complying with annual/aggregate limits, does the institution include all amounts borrowed previously by the student under the Federal Perkins Loan Program (at any institution, including any amounts that have been repaid)?	_____	yes___no___
674.20	L. Is the institution in compliance with the Equal	_____	yes___no___

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Reference	Question		Responsible Office	Response
		Credit Opportunity requirements?		
674.16(a)(1)	M.	Before the institution makes an initial Federal Perkins disbursement to a student, does the institution provide all of the required disclosures listed below:		
		1. The institution's name and the address to which communications and payments should be sent?	_____	yes___no___
		2. The principal amount of the loan and a statement that the institution will report the amount of the loan to a national credit bureau at least annually?	_____	yes___no___
		3. The stated interest rate on the loan?	_____	yes___no___
		4. The yearly and cumulative maximum amounts that may be borrowed?	_____	yes___no___
		5. When repayment will begin and when the borrower will be obligated to pay interest that accrues on the loan?	_____	yes___no___
		6. The minimum and maximum repayment terms which may be imposed and the minimum monthly repayment required?	_____	yes___no___
		7. The total cumulative balance owed by the student to that institution, and an estimate of the monthly payment amount needed to repay that balance?	_____	yes___no___
		8. Special options the borrowers may have for consolidation or other refinancing?	_____	yes___no___
		9. The borrower's right to prepay all or part of the loan, at any time, without penalty, and a summary of the circumstances in which repayment of the loan or interest may be deferred or canceled, including a brief notice of the Department of Defense program for loan repayment based on specified military service?	_____	yes___no___
		10. A definition of default and the consequences to the borrower, including a statement that the institution may report	_____	yes___no___

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Reference	Question		Responsible Office	Response
		the default to a national credit bureau?		
		11. The effect of accepting the loan on eligibility for other forms of student aid?	_____	yes___no___
		12. The amount of any charges collected by the institution at or prior to the disbursement of the loan and any deduction of such charges from the proceeds of the loan?	_____	yes___no___
		13. Any costs that may be assessed on the borrower in the collection of the loan, including late charges and collection and litigation costs?	_____	yes___no___
674.16(a)(2)	N.	Are the required disclosures provided in writing either as part of the written application material, as part of the promissory note, or on a separate written form?	_____	yes___no___
674.16(a)(1)	O.	Is each borrower required to sign a promissory note before the institution makes its first disbursement?	_____	yes___no___
674.31(a)(1) 1998-99 FSFA Handbook, p. 6-13		1. Does the institution use only promissory notes that have been provided by the Department of Education, to which the institution has made no substantive changes?	_____	yes___no___
		2. Does the institution use the appropriate promissory note for Direct Loans and for Federal Perkins loans? *NOTE: Direct Loan provisions apply to any borrower who had an outstanding balance on July 1, 1987, on a loan made under the program (known as the National Direct Student Loan Program prior to October 16, 1986).*	_____	yes___no___
674.32		3. Is the appropriate promissory note for less than half-time borrowers used (if the institution uses a version of promissory note that requires it)?	_____	yes___no___
674.31(a)(2)(iii)		4. If the institution opts to require minimum monthly repayment, does the promissory	_____	yes___no___

Reference		Question	Responsible Office	Response
		note specify the correct amount as listed below?		
674.33(b)(6)(iii)		▸ $40 for loans made on or after 10/1/92, to an individual who had no outstanding balance on a Federal Perkins/NDSL/Defense loan on the date the loan is made;		
674.33(b)(6)(ii)		▸ $30 for all other Federal Perkins and Direct Loans; or		
674.33(b)(6)(i)		▸ $15 for Defense loans.		
674.16(d)(2)	P.	Does the institution obtain the borrower's signature on a promissory note for *each award year* before it disburses any loan funds under that note for that award year (unless it uses a promissory note that requires a signature for each advance)?	_____	yes___no___
1998-99 FSFA Handbook, p. 6-14	Q.	Does the institution make loans without security or endorsement, even when the borrower is a minor? *NOTE: The Higher Education Amendments 1992 eliminated the "defense of infancy" whereby the signing of a contract by a minor would not create a binding obligation. Under the provisions of the law, a minor may sign a promissory note without an endorser or any security, and the minor who signs is responsible for repayment regardless of any state law to the contrary.*	_____	yes___no___
674.16(b),(c),(g)	R.	Are Federal Perkins Loan awards disbursed in equal installments each payment period during the award year unless unequal costs are incurred among payment periods, or unless the total award is less than $501?	_____	yes___no___
674.16(i) 1998-99 FSFA Handbook, p. 6-103	S.	When a disbursement is made, does the institution report the following information to one of the national credit bureaus specified by the Department of Education? ▸ Amount of the disbursement; ▸ Date of the disbursement; and	_____	yes___no___

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Reference		Question	Responsible Office	Response
		▸ Outstanding balance on the loan.		
668.165(a)(2)	T.	When the institution delivers Federal Perkins loan proceeds by crediting the student's institutional account, does it expeditiously notify the student in writing or by equivalent electronic means that it has done so?	_____	yes___no___
668.165(a)(3)(i)		1. Is the required notice sent no earlier than 30 days before, and no later than 30 days after crediting the student's account?	_____	yes___no___
668.165(a)(2)(ii)		a. As part of this notice, does the institution notify students of their right to cancel all or a portion of the loan or disbursement?	_____	yes___no___
668.165(a)(2)(ii)		i. Does the notice inform the student of the procedures and the timeframe by which the cancellation request must be received?	_____	yes___no___
668.165(a)(3)(ii)		2. If the institution provides the notification electronically, does the institution request the borrower to confirm the receipt of the notice?	_____	yes___no___ n/a___
668.165(a)(3)(ii)		a. Does the institution maintain a copy of that confirmation?	_____	yes___no___ n/a___
668.164(g)(2)	U.	If the institution chooses to disburse Federal Perkins Loan funds to a borrower after he/she has ceased to be enrolled, are late disbursements made only if the loan was awarded to the borrower while he/she was still an eligible student?	_____	yes___no___ n/a___
668.164(g)(3)(i)		1. Is the amount of the late disbursement limited to documented educational costs, normally included in the cost of attendance, for the payment period for which the loan was intended and the student was enrolled?	_____	yes___no___ n/a___
668.164(g)(3)(ii)		2. Is the late disbursement made no later than 90 days after the date that the student becomes ineligible to receive the Perkins	_____	yes___no___ n/a___

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Reference	Question		Responsible Office	Response
		Loan funds?		
674.16(f)(1)	V.	Does the institution return to the Perkins account any funds paid to a student who withdraws or is expelled before the first day of classes?	_____	yes___no___
674.16(f)(2)		1. Does the institution regard a student who did not begin class attendance as having withdrawn?	_____	yes___no___
674.41(b)	W.	Does the institution ensure that information available in any of its offices (including the admissions, business, alumni, placement, financial aid, and registrar's offices) is provided to those offices responsible for billing and collecting loans, in a timely manner, as needed to determine: ▸ the enrollment status of the borrower; ▸ the expected graduation or termination date of the borrower; ▸ the date the borrower withdraws, is expelled, or ceases enrollment on at least a half-time basis; and ▸ the current name, address, telephone number and Social Security Number of the borrower?	_____	yes___no___
674.33(a)(1)	X.	Does the institution establish a repayment plan before the student ceases to be enrolled as at least a half-time regular student?	_____	yes___no___
674.33(a)(2)		1. Is the institution aware that the last payment may be combined with the next-to-last if the last payment would be $25 or less?	_____	yes___no___
668.43(c)(6) 674.42(a)(1)	Y.	Does the institution conduct an exit interview with each borrower before he/she leaves the institution, explaining the following issues:		
		1. The loan terms and outstanding balance?	_____	yes___no___
		2. The borrower's duty to repay the loan in accordance with the repayment schedule?	_____	yes___no___

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Reference	Question	Responsible Office	Response
	3. The consequences of default, including, at a minimum, possible referral to a collection firm, reporting to a credit bureau, and litigation?	_____	yes___no___
	4. The borrower's rights to forbearance, deferment, cancellation, or postponement of repayment, and the procedures for filing for those benefits?	_____	yes___no___
	5. The borrower's responsibility to inform the institution immediately of any change of name, address, telephone number, or Social Security Number; and the borrower's responsibility to contact the institution before the due date of any payment he or she cannot make?	_____	yes___no___
674.42(a)(2)	Z. During the exit interview, does the institution disclose the following information, and include it in the promissory note or in another written statement provided to the borrower:		
	1. The name and address of the institution to which the debt is owed?	_____	yes___no___
	2. The name and address of the official or servicing agent to whom communications should be sent?	_____	yes___no___
	3. The name and the address of the party to whom payments should be sent?	_____	yes___no___
	4. The estimated balance owed by the borrower on the loan held by the institution, as of the date on which the repayment period is scheduled to begin?	_____	yes___no___
	5. The stated interest rate on the loan?	_____	yes___no___
	6. A repayment schedule for loans covered by the disclosure, including: ▸ due date of the first payment; and ▸ number, amount, and frequency of required payments?	_____	yes___no___
	7. An explanation of any special options the	_____	yes___no___

Reference	Question	Responsible Office	Response
	borrower may have for loan consolidation or other refinancing of the loan, and a statement that the borrower has the right to prepay all or part of the loan at any time without penalty?		
	8. A description of the charges imposed for failure of the borrower to pay all or part of an installment when due?	_____	yes___no___
	9. A description of any charges that may be imposed as a consequence of default, such as liability for expenses reasonably incurred in attempts by the Department of Education or the institution to collect on the loan?	_____	yes___no___
	10. The total amount of interest charges that the borrower will pay on the loan pursuant to the projected repayment schedule?	_____	yes___no___
	11. General information about the average indebtedness of students with Perkins loans at that institution?	_____	yes___no___
674.42(a)(3)	AA. At the time of the exit interview, does the institution require the borrower to provide:		
	1. his/her expected permanent address after leaving the institution?	_____	yes___no___
	2. his/her expected employer after leaving the institution?	_____	yes___no___
	3. name and address of next of kin?	_____	yes___no___
	4. any corrections in the institution's records relating to the borrower's name, address, Social Security Number, personal references and driver's license number?	_____	yes___no___
674.42(a)(4)(i),(ii)	BB. At the exit interview, does the institution have the borrower sign the repayment schedule and give the borrower a fully executed copy of the signed promissory note and the signed repayment schedule?	_____	yes___no___
674.31(b)(2)(ii)(B)	1. If the student has requested repayment in graduated installments, has the repayment	_____	yes___no___

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Reference	Question	Responsible Office	Response
	schedule been approved by the Department of Education?		
674.42(a)(5)(i)	CC. For students who leave without the institution's knowledge or without an exit interview, does the institution mail the information required for exit interviews to the student, along with a copy of the note and two copies of the repayment schedule with a request to sign and return one of the schedules to the institution?	_____	yes___no___
674.42(a)(4)(iii)	DD. Does the institution retain signed copies of both the promissory note and the repayment schedule in the institution's files?	_____	yes___no___
674.19(e)(4)(i),(v)	1. Are original promissory notes and repayment schedules stored in locked fireproof containers, access to which is restricted to authorized personnel?	_____	yes___no___
674.41(a)(1),(2)	EE. Does the institution keep the borrower informed on a timely basis of all changes in the program that affect his or her rights or responsibilities, and respond promptly to all inquiries from the borrower or any endorser?	_____	yes___no___
	FF. Is the institution familiar with all deferment provisions applicable to each type/date of loan, so as to ensure that the correct provisions are allowed to each borrower:		
674.34	1. Perkins and Direct Loans made on or after 7/1/93?	_____	yes___no___
674.35	2. Perkins loans made before 7/1/93?	_____	yes___no___
674.36	3. Direct Loans made on/after 10/1/80 but before 7/1/93?	_____	yes___no___
674.37	4. Direct Loans made before 10/1/80 and Defense loans?	_____	yes___no___
674.38(a)(1)	GG. Does the institution require written requests and adequate written documentation before granting a deferment?	_____	yes___no___
674.38(d)	1. Does the institution determine the borrower's continuing eligibility for deferment at least annually?	_____	yes___no___

FEDERAL PERKINS LOANS

Reference	Question	Responsible Office	Response
●DCL GEN-97-2 DCL GEN-96-18	HH. Is the institution familiar with allowable modifications of deferment, forbearance, and due diligence provisions for victims of specified recent natural disasters and for affected schools located in the disaster areas?	_____	yes___no___
	1. Has the institution documented actions taken under authorized regulatory relief?	_____	yes___no___ n/a___
674.38(b)(2)	II. Does the institution require a new written repayment agreement as a condition of deferment of a defaulted loan?	_____	yes___no___
674.33(c)(2)(iii)	JJ. Does the institution review annually the status of any borrower whose payment period has been extended due to low income to ascertain whether the borrower is still eligible for the extension?	_____	yes___no___
674.38(c)	KK. Does the institution redetermine the date on which repayment commenced if the borrower demonstrates that for some or all of the period for which a deferment is requested, the borrower had retained in-school status or was within the initial grace period on the loan?	_____	yes___no___
	LL. Is the institution familiar with the cancellations applicable to each type of loan and to loans made between certain dates so as to ensure that the correct provisions are allowed to each borrower:		
674.61	1. Death or permanent and total disability?	_____	yes___no___
674.52(c)(3)	a. Is this cancellation granted without regard to repayment status?	_____	yes___no___
674.60	2. Volunteer service cancellation for Perkins loans?	_____	yes___no___
674.58 674.59(b)	3. Head Start or military service cancellation for Perkins and Direct Loans?	_____	yes___no___
674.53 674.56	4. Teacher or specified employment fields cancellation for Perkins and Direct Loans made on or after 7/23/92?	_____	yes___no___
674.54	5. Teacher cancellation for Perkins and Direct Loans made before 7/23/92?	_____	yes___no___

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Reference	Question	Responsible Office	Response
674.57	6. Law enforcement or corrections officer service cancellation for Perkins and Direct Loans made on/after 11/29/90?	_____	yes___no___
674.55 674.59(a)	7. Teacher or military service cancellation for Defense loans?	_____	yes___no___
674.52(a) 674.62	MM. Does the institution require written requests and adequate written documentation for loan cancellation, and does it ensure that it grants no cancellation for service performed prior to the disbursement of the loan or during the award period of the loan?	_____	yes___no___
674.39	NN. For loans made prior to 7/1/93, does the institution comply with required temporary postponement of loan repayment in anticipation of cancellation?	_____	yes___no___
674.33(d)	OO. Does the institution grant forbearance upon receipt of a written request and proper supporting documentation, when:		
	▸ the borrower's monthly repayment obligation on Title IV loans is collectively equal to or greater than 20% of his/her total monthly gross income; or	_____	yes___no___
	▸ the institution determines that poor health or other acceptable reasons qualify the borrower; or	_____	yes___no___
	▸ ED authorizes a period of forbearance due to a national military mobilization or other national emergency?	_____	yes___no___
674.33(d)(2)	1. Is the forbearance limited to no more than 12 months, renewable for periods that collectively do not exceed 3 years?	_____	yes___no___
674.48(b) 1998-99 FSFA Handbook, p. 6-82	PP. If an outside billing agency is used, does the institution retain responsibility for decisions regarding cancellation, postponement, deferment, extension of repayment periods, and forbearance?	_____	yes___no___
674.31(b)(8) 674.38(a)(2) 674.52(c)	QQ. Does the institution know when it may accelerate a loan, and does it understand and enforce the effects of accelerating a defaulted	_____	yes___no___

Reference	Question	Responsible Office	Response
	loan on cancellation?		
674.43(e)(1)	1. If the institution accelerates a loan, does it provide the borrower: ▸ written notice at least 30 days before the effective date of acceleration; and ▸ written notice on or after the effective date, giving the date on which it accelerated the loan and the total amount due?	_____	yes___no___
	RR. Are optional minimum payment provisions exercised if the loan note includes them?	_____	yes___no___
674.33(b)(1)	1. Does the institution or its billing service understand that interest is included in, not in addition to, minimum monthly repayment amounts?	_____	yes___no___
674.33(b)(4) 1998-99 FSFA Handbook, pp. 6-27 - 6-28	2. Does the institution understand how to exercise minimum repayment provisions when a borrower's loans carry different grace periods, deferment provisions, or interest rates?	_____	yes___no___
674.33(b)(2)	3. Does the institution understand minimum monthly repayment criteria if a borrower has loans from more than one institution?	_____	yes___no___
1998-99 FSFA Handbook, p. 6-28	a. If a borrower contacts the institution with information about Perkins/Direct/Defense loans from other schools, does the institution contact the other schools to negotiate the amount each should receive?	_____	yes___no___
674.42(b)(1)(i) 674.42(b)(2)	SS. For loans with an initial grace period of nine months, does the institution contact the borrower at least three times before the first repayment is due, at 90, 150, and 240 days into the grace period?	_____	yes___no___
674.42(b)(1)(ii) 674.42(b)(2)	TT. For loans with six-month grace periods, does the institution contact a borrower at least twice before the first repayment is due, at 90 and 150 days into the grace period?	_____	yes___no___

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Reference	Question	Responsible Office	Response
674.33(a)(4)	UU. Does the institution apply payments in the following order: (1) collection costs (2) late charges (3) accrued interest (4) principal?	_____	yes___no___
674.48(b)	VV. If an outside billing agency is used, does the institution understand that it remains responsible for compliance with due diligence requirements, other billing and collection matters, and fund safeguarding?	_____	yes___no___
	WW. Is the institution in compliance with the following billing procedures:		
	1. Does the institution send to the borrower at least 30 days before the first payment is due, one of the following:	_____	yes___no___
674.43(a)(1)	▸ coupons, if the institution uses a coupon payment system; or		
674.43(a)(2)(i)	▸ a written notice giving the name and address of the party to which payments are to be sent and a statement of account?		
674.43(a)(2)(ii)(3)	2. If the institution does not use a coupons, does it send a statement of account: ▸ at least 15 days prior to the due date of each subsequent payment; or ▸ if the borrower elects to pay by EFT from a bank account, annually?	_____	yes___no___ n/a___
674.43(b)(1)	3. Does the institution send a first overdue notice within 15 days after a missed due date if it has not received a request for deferment, postponement, or cancellation?	_____	yes___no___
674.43(c)(1)	4. Does the institution, within 30 days after	_____	yes___no___

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Reference	Question	Responsible Office	Response
	the first notice, send a second overdue notice if the borrower does not respond satisfactorily to the first?		
674.43(c)(2)	5. If the student does not respond satisfactorily, does the institution send a final demand letter within 15 days of the second overdue notice?	_____	yes___no___
674.43(d)	a. Is the institution aware that it may send a final demand letter within 15 days after a missed payment if the borrower's repayment history has been unsatisfactory, or if the institution reasonably concludes that the borrower intends neither to repay the loan nor to seek deferment, postponement, or cancellation?	_____	yes___no___
674.43(f)	6. If the borrower does not respond to the final demand letter within 30 days, does the institution attempt to contact the borrower by telephone before beginning collection procedures?	_____	yes___no___
1998-99 FSFA Handbook, p. 6-72	7. If the borrower does not respond satisfactorily to the final demand letter, does the institution exercise due diligence in pursuing recovery from any endorser (for loans made prior to July 23, 1992)?	_____	yes___no___
674.31(b)(5) 674.43(b)(2)	8. Does the institution impose a late charge (or penalty) where the promissory note provides for one?	_____	yes___no___
674.31(b)(5)(ii)(B) 674.43(b)(3)-(5)	a. Are late charges calculated in accordance with regulations?	_____	yes___no___
674.43(b)(6)	b. Does the institution advise the borrower as to the amount of the late charge and how it will be collected?	_____	yes___no___
674.47(c)	c. Is the institution aware that it *must* impose *late* charges on loans made on/after 1/1/86, but may waive late charges if the borrower repays the full amount of past-due payments?	_____	yes___no___
674.44(a)	XX. If mail is returned undelivered, does the	1 1 6 _____	yes___no___

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Reference	Question	Responsible Office	Response
	institution conduct the address search required by regulation, including reviews of institutional records and telephone directories, and inquiries of information operators?		
674.44(a)(3) 1998-99 FSFA Handbook, p. 6-73	1. If the institution uses the ED/Internal Revenue Service's skiptracing service when the normal address search measures are unsuccessful, does it annually submit a Safeguard Activity Report?	_____	yes___no___ n/a_____
674.44(b)	2. If the institution's address search does not yield results, does it use a commercial skiptracing service, or its own personnel using commonly accepted commercial skiptracing practices?	_____	yes___no___
674.44(d)	3. Does the institution make reasonable attempts to locate the borrower at least twice a year until the loan is recovered through litigation, assigned to ED, or written off as allowed by regulation?	_____	yes___no___
674.45(a)	YY. If a loan cannot be collected by regular billing procedures, does the institution initiate regulatory collection procedures if the borrower has not responded satisfactorily to the final demand letter or telephone contact?		
674.45(a)(1)	1. Does the institution report the default to a national credit bureau?	_____	yes___no___
674.45(b)	a. Does the institution report changes in account status to the credit bureau to which it reported the default? *NOTE: It is NASFAA's understanding that if an institution has contracted with a different credit bureau, the institution may comply with this requirement by notifying the credit bureau with which it currently has a contract.*	_____	yes___no___
674.45(b)	b. Does the institution respond within one month to any inquiries it receives from a credit bureau regarding the information reported on the loan amount?	_____	yes___no___

FEDERAL PERKINS LOANS

Reference	Question	Responsible Office	Response
674.45(a)(2)	2. Does the institution either use its own personnel to collect the amount due or engage a collection firm?	_____	yes___no___
674.45(c)(1)	a. If, within 12 months, the loan has not been converted to regular repayment status or been deferred, postponed, or cancelled, does the institution: ▸ litigate; ▸ place the account with a collection firm for 12 months if it has been using its own personnel, or, if it initially used a collection firm, either use its own personnel or place the account with a different collection firm for 12 months; or ▸ assign the loan to ED?	_____	yes___no___
674.45(d)	b. If the loan has not been converted to regular repayment status or been deferred, postponed, or cancelled after the further 12 months described above, does the institution continue to make annual collection attempts until the loan has been recovered through litigation, assigned to ED, or written off as allowed by regulation?	_____	yes___no___
674.46(a)	3. If collection attempts are unsuccessful, does the institution determine at least annually whether it must sue the borrower under due diligence regulations?	_____	yes___no___
674.47(f)	4. Does the institution properly document all collection costs charged to its Perkins Fund?	_____	yes___no___
674.45(e)(2) 674.46(b)	5. Does the institution properly assess all collection and litigation costs and attempt to recover the costs from the borrower?	_____	yes___no___
674.47(d),(e)	a. Does the institution understand the circumstances under which it may waive collection costs and the limitations on charging waived costs	_____	yes___no___

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Reference	Question	Responsible Office	Response
	to its Perkins Fund?		
674.45(e)(3)	b. Does the institution reimburse its Perkins Fund with monies recovered from a borrower for collection costs?	_____	yes___no___
674.50(h)	6. If the institution assigns a defaulted loan to ED, does it consider the borrower to be in default for Title IV eligibility purposes until ED confirms satisfactory arrangements to repay the loan?	_____	yes___no___
674.50	a. Does the institution maintain adequate documentation to assign defaulted loans to ED?	_____	yes___no___
674.47(g)(1)	7. Does the institution realize that it may cease collection activity on defaulted accounts with balances of less than $25 (including principal, interest, late charges, and collection costs), provided regulatory billing procedures had been followed?	_____	yes___no___
1998-99 FSFA Handbook, p. 6-76	a. Does the institution continue to consider the borrower to be in default and to include the loan in its default rate?	_____	yes___no___
674.47(g)(2)	8. Does the institution realize that it may cease collection activity on a defaulted account with a balance of less than $200 (including principal, interest, late charges, and collection costs) on which the regulatory due diligence procedures have been carried out, if, for at least 4 years, the borrower has not: made a payment on the account; converted the account to regular repayment status; or applied for a deferment, postponement, or cancellation?	_____	yes___no___
1998-99 FSFA Handbook, p. 6-76	a. Does the institution continue to consider the borrower to be in default and to include the loan in its default rate?	_____	yes___no___
674.47(h)	9. Does the institution realize that it may write off balances of less than $5 (including principal, interest, late charges, and collection costs), provided it no longer	_____	yes___no___

Reference	Question	Responsible Office	Response
	includes that balance as an asset of its Perkins Fund?		
FR, 12/1/95, p. 61807	a. Does the institution treat that account as paid-in-full with no adverse effect on the borrower or on the institution's default rate?	_____	yes___no___
674.49	10. Does the institution suspend all collection efforts as soon as it receives notice that a bankruptcy petition has been filed, and otherwise follow regulations governing treatment of petitions for bankruptcy and notices of discharge?	_____	yes___no___
674.5(f)(2)	ZZ. If a defaulted borrower repays the defaulted loan in full, or executes a new repayment agreement and makes 12 consecutive monthly payments, does the institution report the rehabilitation within 30 days to any national credit bureau?	_____	yes___no___
674.33(e)	AAA. Does the institution compromise on the repayment of a defaulted loan only if the institution has fully complied with all due diligence requirements and the borrower pays 90% of the outstanding principal balance plus the interest due plus any collection fees in a lump-sum payment?	_____	yes___no___
674.8(b) 674.47 674.18(b) 673.7(e)	BBB. Does the institution use monies from the Federal Perkins Loan Fund only for the purposes listed below? ▸ Making loans to students. ▸ Administrative expenses, including student consumer information services. ▸ Litigation costs. ▸ Other collection costs approved by ED. ▸ Repayment of short-term no-interest loans made to the Fund by the institution anticipating collections or receipt of FCC. ▸ Transferring funds (up to 25% of its total allocation) to FWS and/or FSEOG for use according to the requirements of the program to which they are transferred.	_____	yes___no___

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FEDERAL PERKINS LOANS

Reference	Question	Responsible Office	Response
674.18(b)(5)	1. Does the institution transfer back to the Federal Perkins Loan program any funds unexpended at the end of the award year that it transferred to the FWS program or to the FSEOG program?	_____	yes___no___
674.8(a)	CCC. Does the institution deposit into its Federal Perkins Loan Fund: FCC, ICC, payments of principal, interest, late charges, penalty charges, collection costs, loan cancellation payments, any other earnings on the Fund (including interest net of bank charges), and proceeds of short-term, no-interest loans made in anticipation of collections or FCC?	_____	yes___no___
674.19(c)	1. Is the institutional matching contribution portion deposited into its Fund prior to or at the same time any Federal Capital Contribution (FCC) is deposited according to the following match requirements?	_____	yes___no___
674.8(a)(2)(ii) 674.7(a)(1)	ICC = 1/3 of the FCC for non-ELO institutions; or ICC = 100% of the FCC for institutions participating in the ELO		
674.19(e)(2)	DDD. Does the institution maintain a repayment history for each borrower which shows: ▸ the date and amount of each repayment; ▸ how much of each repayment is credited to principal and interest, late or penalty charges, and collection costs; and ▸ the date, nature, and result of each contact with the borrower, and copies of all non-routine correspondence to or from the borrower?	_____	yes___no___
674.19(e)(3)	1. Does the institution retain repayment records, including cancellation and deferment requests, for at least three years from the date on which a loan is assigned, canceled, or repaid?	_____	yes___no___
674.19(e)(4)(iii)	EEE. Once the loan is repaid, does the institution return the original notes marked "paid in full"	_____	yes___no___

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Reference	Question		Responsible Office	Response
		to the borrower?		
674.19(e)(4)(ii)	FFF.	Does the institution retain certified true copies of documents released for loan enforcement?	_____	yes___no___
674.8(c)	GGG.	Does the institution submit to ED an annual report showing the total number of loans made from its Fund which are in default (part of the FISAP)?	_____	yes___no___

Other Recommended Good Practices for the Administration of the Federal Perkins Loan Program

Practice	Comments
1. One institutional administrator or officer should be charged with the responsibility for supervising loan collections and closely monitoring routine loan collection steps.	
2. The loan application and exit interview forms should contain adequate "tracer" questions to facilitate contacting the borrower after he or she leaves the institution.	
3. Documentation that exit counseling of borrowers has taken place should be maintained in the student's file.	
4. If exit interview information and forms are mailed to a borrower who left the institution without an exit interview, the institution should use registered or certified mail with a receipt requested to document the student's file in case the student does not respond.	
5. The institution should develop a means of verifying the total cumulative amount a student may have borrowed under the Federal Perkins Loan Program.	
6. The institution should set up procedures to follow whenever a notice is received of a bankruptcy petition filed by a Federal Perkins Loan borrower. The procedures should be approved by legal counsel and should assure that the institution take appropriate prompt action.	
7. Institutional procedures should be developed to ensure that financial aid transcript information for a student whose notes have been assigned to the Department indicate the student is in default.	
8. Written procedures should be developed and followed to make sure that the institution is carrying out due diligence in the collection process.	
9. The institution should establish procedures for updating personal information about borrowers to facilitate collection activities at a later date.	

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Items marked ● applied to 1997-98 but not to subsequent years.
Items marked ✦ are effective beginning 1998-99.

Comments on the Administration of the Federal Perkins Loan Program_____

Items marked ● applied to 1997-98 but not to subsequent years.
Items marked ✦ are effective beginning 1998-99.

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V. Federal Work-Study (FWS) Program

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
675.8(c) 675.10(a)	A. Does the institution make FWS employment reasonably available, to the extent of available funds, to all eligible students?	_____	yes___no___
675.8(d)	1. Does the institution make any equivalent employment it offers or arranges reasonably available, to the extent of available funds, to all students who want to work?	_____	yes___no___ n/a___
675.8(e)	B. To the maximum extent practicable, do FWS positions complement and reinforce educational programs or goals of students?	_____	yes___no___
675.8(g)	C. Are all eligible students informed of the opportunity to perform community service?	_____	yes___no___
	1. Has the institution identified community-service opportunities through consultation with local nonprofit, governmental, and community-based organizations?	_____	yes___no___
675.18(h)	D. Does the institution use at least 5% of the sum of its initial and supplemental FWS allocations for an award year to compensate students employed in community service activities?	_____	yes___no___
675.2(b) 1998-99 FSFA Handbook, p. 7-20	1. Does the institution classify jobs as community service according to regulatory definitions?	_____	yes___no___
	E. Does the institution ensure that FWS students only work for eligible employers performing FWS-eligible work?	_____	yes___no___
675.22(a) 675.20(c)(2)(v)	1. If the student is employed by a private nonprofit organization or by a Federal, State, or local public agency (other than the U.S. Department of Education, which is not an eligible employer), is the work performed by the student in the public interest (i.e., for the national or community welfare)?	_____	yes___no___ n/a___
675.22(b)(1)	a. Does the institution ensure that FWS work does not primarily benefit members of a limited membership organization (e.g., credit union, fraternal/religious order, cooperative)?	_____	yes___no___

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Reference	Question	Responsible Office	Response
675.22(b)(3),(5), (6)	b. Does the institution ensure that FWS work does not involve: ▸ work as a political aide; ▸ partisan or non-partisan political activity; ▸ association with a faction in an election for public office; or ▸ lobbying?	_____	yes___no___
675.22(b)(2); 1998-99 FSFA Handbook, p. 7-29	c. Is FWS work for elected officials limited to non-political work for officials responsible for the *regular administration* of Federal, State, or local government?	_____	yes___no___
675.22(b)(4)	d. Does the institution ensure that a student's political support or party affiliation is not taken into account in hiring him or her?	_____	yes___no___
675.21(b)	2. If a proprietary school student is employed by the proprietary institution, are students placed either: ▸ in on-campus jobs that furnish student services and do not involve solicitation of other potential students to enroll; or ▸ in community service?	_____	yes___no___ n/a___
675.23(b)(1)	3. If a student is employed in a private, for-profit organization, is the work restricted to jobs that are academically relevant to the student's educational program?	_____	yes___no___ n/a___
675.23(b)(2)(ii)	a. Does the institution ensure that FWS funds are not used to pay an employee who would otherwise be employed by that organization?	_____	yes___no___ n/a___
675.20(b)(1) 1998-99 FSFA Handbook, p. 7-30	F. Does the institution maintain a written agreement with each off-campus agency, organization, or company that employs its Federal Work-Study students?	_____	yes___no___ n/a___

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Items marked ● applied to 1997-98 but not to subsequent years.
Items marked ✦ are effective beginning 1998-99.

FEDERAL WORK -STUDY

Reference	Question	Responsible Office	Response
675.20(b)(2)	1. Does the institution enter into off-campus agreements only with agencies or organizations that have professional direction and staff?	_____	yes___no___ n/a___
675.20(b)(1)	2. Does the agreement specify who will pay the student?	_____	yes___no___ n/a___
675.23(b)(2)(i)	a. Does the agreement with a for-profit organization require the for-profit organization to pay the non-federal share of student earnings?	_____	yes___no___ n/a___
675.20(c)(2)(i), (ii),(iii)	G. Does the institution ensure that FWS work for any employer does not impair existing contracts or displace regular employees or fill jobs that are vacant because of a strike?	_____	yes___no___
675.20(c)(1)	H. Is FWS work (regardless of employer) governed by employment conditions, including pay, that are appropriate and reasonable in terms of type of work, geographical region, employee proficiency, and any applicable federal, state or local law?	_____	yes___no___
675.20(c)(2)(iv)	I. Does the institution ensure that FWS work does not involve the construction, operation or maintenance of any part of a facility used for religious worship or sectarian instruction?	_____	yes___no___
675.25(a)	J. Are attributed earnings to be applied to the cost of attendance determined by subtracting taxes and job-related costs from gross earnings?	_____	yes___no___
675.25(b)	1. For a student employed under FWS during a period of non-enrollment (e.g., summer), are attributed earnings applied to the cost of attendance for the next period of enrollment?	_____	yes___no___
	K. In establishing wage rates:		
675.24(a)(1)	1. Is compensation for undergraduate students computed only on an hourly basis for actual time on the job?	_____	yes___no___
675.24(a)(2)	2. Are fringe benefits excluded from the wage rate?	_____	yes___no___

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Reference	Question	Responsible Office	Response
675.24(a)(3)	3. Is the institution aware that it may pay graduate students a salary or hourly wages, in accordance with its usual practices?	_____	yes___no___
675.24(b); DCL CB-96-23	4. Are minimum hourly wage rates under the Fair Labor Standards Act enforced?	_____	yes___no___
	L. With respect to payment of FWS funds to students, does the institution:		
675.16(a)(1)(i)	1. provide payment to each FWS employee at least once a month, with the federal share of each payment (at least) paid to the student by check or similar instrument that the student can cash on his or her own endorsement?	_____	yes___no___
675.16(b)(1)	2. if the institutional share of wages is paid by check, pay the student its share at the same time it pays the Federal share?	_____	yes___no___
675.16(b)(2)	3. if the institutional share of wages is paid in the form of tuition, fees, services, or equipment, pay that share before the student's final payroll period?	_____	yes___no___
675.16(b)(3)	4. if the institution pays its FWS matching share in the form of prepaid tuition, fees, supplies, or equipment for a forthcoming academic period, give the student a statement before the close of his or her final payroll period listing the amounts earned for those items?	_____	yes___no___
675.16(a)(1)(ii)	5. ensure that no portion of the Federal share of a student's wages is directly transferred to the student's institutional account?	_____	yes___no___
675.16(d)	6. refrain from obtaining a student's power of attorney to authorize any disbursement of funds without prior approval from the Department of Education?	_____	yes___no___
675.16(c)	7. require correspondence students to submit their first completed lesson before receiving payment?	_____	yes___no___ n/a___
	8. if required, withhold Federal, State or local income taxes, Social Security, or other	_____	yes___no___

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Reference	Question	Responsible Office	Response
	charges from student salaries, in accordance with applicable tax laws and regulations?		
675.20(b)(3)(ii); 1998-99 FSFA Handbook, p. 7-31	M. Does the institution ensure that students working for an off-campus employer are properly supervised?	_____	yes___no___
675.16(a)(2)	N. Does the institution assume responsibility for ensuring that students employed off-campus are paid for work performed, even if the off-campus agency or organization is considered to be the employer?	_____	yes___no___ n/a___
675.26(a)(3)	O. Does the institution ensure that FWS funds are not used to pay a student after he or she has, in addition to other resources, earned $300 or more over his or her financial need?	_____	yes___no___
	P. Does the institution maintain program and fiscal records that:		
675.19(b)(2)(i)	1. include a certification, signed by the student's supervisor (an official of the institution or off-campus agency), that each student has worked and earned the amount being paid?	_____	yes___no___
	a. Does the certification include or is it supported by a time record (either in clock hour sequence or showing the total hours worked per day) for students paid on an hourly basis?	_____	yes___no___
675.19(b)(2)(ii)	2. include a payroll voucher containing sufficient information to support all payroll disbursements?	_____	yes___no___
675.19(b)(2)(iii)	3. include a non-cash contribution record to document any payment of the institution's share of the student's earnings in the form of services and equipment?	_____	yes___no___
675.20(b)(3)(i) 1998-99 FSFA Handbook, p. 7-30	Q. If an off-campus employer has payroll responsibility, does the institution ensure that payment is properly documented by keeping copies of time sheets and payroll vouchers and evidence that the students were actually paid (usually a copy of the cancelled check or a receipt signed by the student)?	_____	yes___no___

Reference	Question	Responsible Office	Response
	R. Does the institution ensure that the federal share of FWS compensation does not exceed the following allowable percentages:		
675.26(a)(2)	1. For students employed by a *for-profit organization*: 50%?	_____	yes___no___ n/a___
675.23(b)(2)(i)	a. Does the institution require a for-profit institution to pay the matching share?	_____	yes___no___ n/a___
675.26(a)(1)	2. For students employed *other than by a for-profit organization* (i.e., students employed by the institution itself, or in a federal, state, or local agency, or in a private nonprofit organization): 75%?	_____	yes___no___
675.26(b)	3. When determining the Federal share of FWS, does the institution exclude fringe benefits and the employer's share of any welfare or insurance programs (such as Social Security or worker's compensation)?	_____	yes___no___
●675.26(d) ✦675.26(d)(1)	S. Does the institution authorize a federal share of 100% of the compensation earned by a student to be paid only if the work performed by the student is for the institution itself, for a Federal, State or local public agency, or for a private nonprofit organization; *and one of the following is true*:		
●675.26(d)(1) ✦675.26(d)(2)(i)	1. The student is enrolled at an institution designated as eligible under the Strengthening Institutions program, the Strengthening Historically Black Colleges and Universities program, or the Strengthening Historically Black Graduate Institutions program; and the institution has requested a waiver of the matching requirements?	_____	yes___no___ n/a___
●675.26(d)(2) ✦675.26(d)(2)(ii) DCL CB-97-12	2. The student is employed as a reading tutor for children who are in preschool through elementary school?	_____	yes___no___ n/a___
DCL CB-97-12	a. Does the institution follow its State's determination of who constitutes "children who are in elementary school?"	_____	yes___no___

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Reference	Question	Responsible Office	Response
DCL CB-97-12	b. Is the institution aware that there is no limit on the amount of funds it can expend from its FWS allocation to pay FWS students employed as reading tutors?	_____	yes___no___
1998-99 FSFA Handbook, p. 7-24	c. Is the institution aware that an FWS reading tutor job that qualifies for a waiver of the institutional share requirement may not meet the community service requirement?	_____	yes___no___
1998-99 FSFA Handbook, p. 7-25	d. Is the institution aware that a reading tutor's training period, and preparation and evaluation time may be paid entirely from the federal share of its FWS allocation?	_____	yes___no___
✦675.26(d)(2)(iii) ✦DCL CB-98-6	3. ✦The student is employed as a tutor in a family literacy program that provides services to families with preschool age children or children who are in elementary school?	_____	yes___no___ n/a ___
✦DCL CB-98-6	a. ✦Does the institution understand that in order to qualify for the waiver of the institutional share requirement, the family literacy program must provide: ▸ literacy or pre-literacy education for children; ▸ literacy training for parents or caregivers of children in the program; ▸ a means of equipping parents and caregivers with the skills needed to partner with their children in reading; and ▸ literacy activities between parents or caregivers and their children?	_____	yes___no___
✦DCL CB-98-6	i. ✦Does the institution understand that all four of the above components are necessary to meet the	_____	yes___no___

Reference	Question	Responsible Office	Response
	definition of family literacy program?		
✦DCL CB-98-6	b. ✦Does the institution follow its State's determination of who constitutes "children who are in elementary school?"	_____	yes___no___
✦DCL CB-98-6	c. ✦Is the institution aware that tutors employed under family literacy programs may tutor children or adults in areas other than reading?	_____	yes___no___
✦DCL CB-98-6	d. ✦Is the institution aware that there is no limit on the amount of funds it can expend from its FWS allocation to pay FWS students employed as tutors under a family literacy program?	_____	yes___no___
✦DCL CB-98-6	e. ✦Is the institution aware that an FWS family literacy tutor job that qualifies for a waiver of the institutional share requirement may not qualify as a community service job?	_____	yes___no___
✦DCL CB-98-6	f. ✦Is the institution aware that a family literacy tutor's training period, and preparation and evaluation time, may be paid entirely from the federal share of its FWS allocation?	_____	yes___no___
675.26(c)	T. If the institution receives more funds under an off-campus agreement than is required for non-federal share of wages, employer costs, and administrative costs, are the excess funds: ▸ used to reduce the Federal share; ▸ held in trust for the next year's off-campus employment; or ▸ refunded to the off-campus employer?	_____	yes___no___
675.18(e)	U. Does the institution observe the 25% limit on the amount of its total FWS allocation that it may transfer to FSEOG?	_____	yes___no___
675.18(e)(3)	1. Are transfers reported on the institution's Fiscal Operations Report?	_____	yes___no___

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Reference	Question	Responsible Office	Response
675.18(e)(2)	2. Are transferred funds used according to the requirements of the FSEOG Program?	_____	yes___no___
675.18(b),(c)	V. Does the institution observe the 10% limit on funds carried forward and back?	_____	yes___no___
675.18(b)(2)	1. Does the institution spend any funds that were carried forward before it spends its current year allocation?	_____	yes___no___
1998-99 FSFA Handbook, p. 7-42	2. Does the institution ensure that carried-forward or carried-back funds are not transferred to FSEOG, or used for the federal share of wages in private for-profit sector jobs, or job location and development programs?	_____	yes___no___
675.18(f)	W. Is the institution aware that, separate from the 10% carry-back, it may pay FWS wages earned on or after May 15 but prior to the beginning of the next award year from the succeeding year's allocation?	_____	yes___no___
675.23(a)	X. Is the limit of 25% of the institution's total allocation observed for jobs in private, for-profit organizations?	_____	yes___no___
	Y. If the institution is participating in a Job Location and Development (JLD) Program:		
675.35(a)	1. Does it have a signed agreement with the Secretary of Education?	_____	yes___no___ n/a___
675.35(a)(3)(i) DCL CB-97-5	2. Does it comply with the prohibition against locating and developing jobs at any eligible institution under the JLD program?	_____	yes___no___ n/a___
675.35(b)(3)(ii)	3. Are the jobs located and developed with these funds available only to students during and between periods of attendance at the institution, and not upon graduation?	_____	yes___no___ n/a___
675.32	4. Does the institution limit JLD expenditures from FWS funds to 10% of its total allocation or $50,000, whichever is less?	_____	yes___no___ n/a___
675.35(b)(3)(iii)	5. Has the institution taken steps to ensure that the Job Location and Development Program	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
	will not displace employees or impair existing contracts for services?		
675.35(b)(3)(iv)	6. Are the program funds expended realistically expected to generate more in total student wages than is spent under the program?	_____	yes___no___ n/a___
675.35(b)(3)(v)	7. If the institution uses Federal funds to contract with another organization, are suitable performance standards part of the contract?	_____	yes___no___ n/a___
675.36	8. Are procedures and records established in accordance with FWS program regulations governing fiscal procedures and records?	_____	yes___no___ n/a___
675.33(b)	9. Does the institution use FWS funds for no more than 80% of allowable JLD costs?	_____	yes___no___ n/a___
675.33(a)(2)	a. Does the institution restrict allowable costs to costs reasonably related to carrying out the JLD program, excluding any costs related to the purchase, construction, or alteration of physical facilities and indirect administrative costs?	_____	yes___no___ n/a___
675.33(c)	10. Does the institution keep records documenting the amount and source of its share of allowable costs (whether in cash or in the form of services)?	_____	yes___no___ n/a___
DCL CB-97-5	11. Is the institution aware that the JLD program can be used to locate and develop jobs for FWS students, including community service jobs?	_____	yes___no___ n/a___
DCL CB-97-5	a. Does the institution understand that using JLD funds to find jobs only for FWS students would not satisfy the statutory requirement to expand off-campus jobs for currently enrolled students who want jobs, regardless of need?	_____	yes___no___ n/a___
	Z. If the institution wishes to expend funds under a Work-Colleges program, has the institution:		

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Reference	Question	Responsible Office	Response
675.41(a)	1. operated a comprehensive work-learning program for at least two years; and	_____	yes___no___ n/a___
	2. adhered to the requirements governing work-colleges contained in subpart C of the FWS regulations?	_____	yes___no___ n/a___
675.18(a)	AA. Does the institution use its FWS funds only to:		
	1. pay the Federal share of FWS wages;	_____	yes___no___
	2. carry out administrative activities, including student consumer information services;	_____	yes___no___
	3. meet the cost of a Job Location and Development program;	_____	yes___no___ n/a___
	4. meet the cost of a Work-Colleges program; or		yes___no___ n/a___
	5. transfer funds to its FSEOG Program?	_____	yes___no___ n/a___
	BB. Is the institution in compliance with Immigration and Naturalization Service (INS) verification requirements for employment eligibility, including the I-9?	_____	yes___no___

Other Recommended Good Practices for the Administration of the FWS Program _____

Practice	Comments
1. The institution should suit FWS employment to the scheduling and other needs of students.	
2. Each supervisor should receive written student employment procedures outlining the program purposes and regulations and the supervisor's responsibilities regarding the FWS program.	
3. All job referrals and confirmations should be made in writing showing the title, duties, hourly wage rate, and any special conditions of employment.	
4. It should be suggested to the employer and the student that the student's award and number of hours per week of employment be pro-rated over the period covered by the award.	

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Practice **Comments**

5. The institutions may wish to use a variable wage scale to recognize prior experience and level of skill required.

6. Each FWS employee must be compensated for all hours worked; the Fair Labor Standards Act prohibits employers from accepting voluntary services from any paid employee.

7. Periodic visits should be made to each off-campus employer.

8. Both the student and the supervisor should be notified before the student's award expires.

9. FWS employment should be terminated when such action is appropriate (i.e., unsatisfactory performance, repeated absences, insubordination) and the student should be counseled regarding such action.

10. FWS supervisors should be provided a copy of the Students' Rights and Responsibilities regarding Financial Aid.

11. Job descriptions should be maintained for all FWS positions. Job descriptions should include:
    a. name and address of the employer (department, public agency, non-profit organization)
    b. purpose of job
    c. duties and responsibilities
    d. job qualifications
    e. wage rate and range
    f. length of employment (beginning and ending dates)
    g. name of supervisor

12. The institution should develop procedures to ensure that only students who will be enrolling in the subsequent period of enrollment may be allowed to work under FWS during a period on non-enrollment.

Comments on the Administration of the Federal Work-Study Program _____

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VI. Federal Supplemental Educational Opportunity Grant (FSEOG)

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
676.9(b) 676.2	A. Is FSEOG awarded only to undergraduate students who have not yet earned a baccalaureate or first professional degree?	_____	yes___no___
676.10(a) DCL CB-91-8	B. Does the institution observe the required priority order for awarding FSEOG, awarding first to students with the lowest Expected Family Contributions (EFC), who will also receive Federal Pell Grants; and, if FSEOG funds are still available after awarding to all its eligible Federal Pell Grant recipients, next to those eligible students with the lowest EFCs who will not receive Federal Pell Grants?	_____	yes___no___
676.20(a)(1),(b)	C. Is a minimum award of $100 per academic year observed, unless the institution reduces the minimum proportionately for students enrolled less than a full academic year?	_____	yes___no___
676.20(a)(2),(c)	D. Is the maximum limit of $4,000 (or $4,400 if reasonable costs for a program of study abroad exceed the cost of attendance at the home institution) per academic year observed for FSEOG awards?	_____	yes___no___
676.16(a),(b),(e)	E. Are FSEOG awards disbursed in equal installments each payment period during the award year unless unequal costs are incurred among terms, or unless the total awarded under FSEOG is less than $501?	_____	yes___no___
676.16(f)	F. Are correspondence students required to submit their first lessons before receiving an FSEOG payment?	_____	yes___no___ n/a___
668.164(g)(2)(ii)(E)	G. If the institution chooses to disburse FSEOG funds to a student after he/she has ceased to be enrolled, does it ensure that late disbursements are made only if the FSEOG was awarded to the student while the student was still eligible?	_____	yes___no___ n/a___
668.164(g)(3)(i)	1. Is the amount of the late disbursement limited to documented educational costs normally included in the COA for the payment period for which the FSEOG was intended and the student was enrolled?	_____	yes___no___ n/a___

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FSEOG

Reference	Question	Responsible Office	Response
676.16(d)	H. Does the institution return to the FSEOG account any funds paid to a student who withdraws or is expelled before the first day of classes?	_____	yes___no___ n/a___
676.16(d)(2)	1. Does the institution regard a student who did not begin class attendance as having withdrawn?	_____	yes___no___ n/a___
676.18(a) 673.7(e)	I. Are FSEOG funds used only for the purposes of making payments to eligible students and for allowable administrative expenses including student consumer information services?	_____	yes___no___
676.18(b)	J. Does the institution transfer back to the FWS or Federal Perkins Loan programs at the end of the award year any unexpended funds that had been transferred into FSEOG?	_____	yes___no___
676.21(a),(b)	K. Does the institution observe the Federal share limitation (75% unless otherwise authorized by the Department of Education)?	_____	yes___no___
676.21(c)	1. Does the non-federal share of FSEOG awards come from the institution's own resources, including institutional grants and scholarships, tuition or fee waivers, state scholarships (except SSIG funds), and foundation or other charitable organization funds?	_____	yes___no___
673.5(f)(5)	L. If the student fails to repay an overpayment on which the Federal share is $25 or more and the overpayment is one for which the institution is not liable, does the institution refer the overpayment to the Department of Education?	_____	yes___no___

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VII. Federal Family Education Loan (FFEL) Program

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
668.16(m) 668.17(a),(b)	A. Does the institution understand the impact of its FFEL cohort default rate on institutional eligibility to participate in:		
	1. the FFEL Program?	_____	yes___no___
	2. all Title IV programs?	_____	yes___no___
682.603(g)	B. Does the institution understand that it may not assess a fee for completing or certifying any FFEL form or information, or for providing information necessary to receive a FFEL Loan or any benefits associated with a FFEL Loan?	_____	yes___no___
682.201(a) 668.32(a)(2)	C. Does the institution certify a loan only if the student will be enrolled at least half-time?	_____	yes___no___
	D. Does the institution hold as *ineligible* for FFEL Loans students who:		
668.32(c)(2)(i)	1. are incarcerated?	_____	yes___no___ n/a___
682.201(a)(7); 1998-99 FSFA Handbook, p. 10-4	2. are serving in a medical internship or residency program (other than dentistry), unless it is part of the degree program?	_____	yes___no___ n/a___
682.201(a)(5)	E. Is the institution aware that if a borrower's previous FFEL Loan was canceled due to total permanent disability, the borrower: ▸ must obtain a physician's certification that he/she is able to engage in substantial gainful activity; and ▸ must waive future cancellation based on the disability unless it substantially deteriorates?	_____	yes___no___
682.201(a),(b)	F. In the case of a Federal PLUS loan, does the institution ensure that both the parent and student for whom the parent is borrowing meet eligibility requirements?	_____	yes___no___
668.2, Parent 682.201(b)(2) 1998-99 FSFA Handbook, p. 10-7	1. Does the institution understand the definition of parent, and realize that a stepparent is an eligible PLUS borrower if his/her income and assets would have been taken into account when calculating the	_____	yes___no___

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Reference	Question	Responsible Office	Response
	student's expected family contribution, even if the stepparent is not a legal guardian or adoptive parent?		
682.201(a)(1) 1998-99 FSFA Handbook, p. 10-5	G. Does the institution have in place a means of determining Federal Pell Grant eligibility or ineligibility and ensuring that eligible students apply for the Federal Pell Grant prior to certifying a Federal Stafford application?	_____	yes___no___
1998-99 FSFA Handbook, p. 10-5	H. Does the institution document the exceptional circumstances leading to a professional judgment allowing a dependent undergraduate to borrow under the additional unsubsidized loan limit?	_____	yes___no___
682.201(a)(3)	1. Does the institution recognize that a parent's refusal to borrow a PLUS loan does not constitute an exceptional circumstance?	_____	yes___no___
682.603(e)	I. Does the institution document, and provide in writing to the borrower, its reasons for declining to certify a FFEL Loan, or for reducing the amount of the loan?	_____	yes___no___
682.603(e)(1)	1. Does the institution make such judgments only on a case-by-case basis?	_____	yes___no___
682.603(e)(2)	2. Is the documentation supporting such a decision retained in the student's file?	_____	yes___no___
	3. Does the institution realize it may decline to certify a loan it believes the student is unwilling to repay?	_____	yes___no___
682.603(e)(3)	4. In exercising this discretion, does the institution ensure that it does not engage in any discriminatory practice based on the borrower's race, sex, color, religion, national origin, age, handicapped status, income, or selection of a particular lender or guaranty agency?	_____	yes___no___
HEA, 483(a)(1); 682.401(b)(5)	J. Does the institution require that the borrower clearly indicate a choice of lender?	_____	yes___no___
1998-99 FSFA Handbook, p. 10-5	K. Does the institution determine the amount of a	_____	yes___no___

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Reference	Question	Responsible Office	Response
	student's subsidized Stafford loan eligibility before certifying an unsubsidized amount?		
1998-99 FSFA Handbook, p. 10-5	1. If the student's subsidized eligibility is more than $200, does the institution include that amount in determining the student's eligibility for the unsubsidized loan?	_____	yes___no___
✦682.201(a)(2)	2. Is the institution aware that it may chose not to certify a subsidized Stafford loan for a student with need of $200 or less, and instead may include that amount in an unsubsidized Stafford Loan?	_____	yes___no___
FR, 9/25/97, p. 50462	*NOTE: This provision previously applied to the SLS Program. In the past, the Department of Education has stated that the provision carried over to Unsubsidized Stafford loans, because the Unsubsidized Stafford loan was effectively the replacement for the SLS loan. This change to the regulation is a technical correction only, to reflect a long-standing FFEL program policy.*		
FR 11/28/97, p. 6342	3. Is the institution aware that in the FFEL program, the ability of a borrower to receive a subsidized loan of $200 or less rests, ultimately, with the lender, and although the institution may certify a loan for $200 or less, but it cannot compel a lender to actually make a loan of this amount to a borrower?	_____	yes___no___
682.603(b)(3) 682.200(b), Estimated financial assistance, (1)	L. Has the institution established procedures to calculate accurately the assistance the student *will receive* from Federal, State, institutional or other sources, such as scholarships, grants, loans, and need-based employment, including but not limited to Federal Pell Grant, campus-based funds, Veterans or other educational benefits, and ROTC?	_____	yes___no___
682.200(b), Estimated financial assistance, (2)	1. Does the institution ***exclude*** from estimated financial assistance:		
	▸ any amounts used to replace the expected family contribution from unsubsidized Federal Stafford, Direct	_____	yes___no___

Reference	Question	Responsible Office	Response
	Unsubsidized, PLUS, state-sponsored, or private loans?		
	▸ any Federal Perkins or FWS awards that the student declined or for which the student did not apply?	_____	yes___no___
1996-97 FSFA Handbook, p. 10-74	M. For students charged "up front" for an entire program that is longer than an academic year, does the institution include all tuition/fee charges in the first academic year loan, and no tuition/fee charges for additional loans for that program?	_____	yes___no___
682.200(b), Period of enrollment	N. Does the institution certify loan periods that coincide with a bona fide academic term established by the school for which institutional charges are generally assessed (e.g., semester, trimester, quarter, length of the student's program, or academic year)?	_____	yes___no___
682.603(f)(2)	1. Is the *maximum* period of enrollment for which a loan is certified the length of the academic year, except in cases where the guaranty agency permits a longer period of time (not to exceed 12 months)?	_____	yes___no___
682.603(f)(1)	2. Is the *minimum* period for which the institution certifies a loan a single academic term (e.g., a semester, trimester or quarter) or, for a clock hour or non-term program, the lesser of the length of the program or the length of the academic year? *NOTE: For a student who is in a clock hour or non-term program longer than an academic year, the institution may also certify a loan period that reflects the remaining portion of the program, even if that portion is less than an academic year.*	_____	yes___no___
682.603(d) 682.204(a),(c),(d),(k)	O. Are procedures in place to ensure that an application will not be certified for an amount that exceeds the lesser of the student's need (estimated cost of attendance minus estimated financial assistance, and, in the case of subsidized Stafford loans, minus the expected family contribution), or applicable annual loan limits?	_____	yes___no___

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Reference	Question	Responsible Office	Response
682.204(a),(c),(d) 682.603(f)(3)	P. Does the institution observe the reduced annual Federal Stafford Loan limits (subsidized and unsubsidized) for undergraduates enrolled in:		
	▸ a program that is less than a full academic year in length?	_____	yes___no___ n/a___
	▸ the final portion of a program longer than an academic year, if that portion is less than an academic year in length?	_____	yes___no___
682.603(f)(4)	1. Does the institution realize that it need not recalculate the amount of the loan if the number of hours for which an eligible student is enrolled changes after the school certifies the loan?	_____	yes___no___
1998-99 FSFA Handbook, pp. 10-26 - 10-28	Q. Does the institution understand the requirements pertaining to the period to which annual loan limits apply, and when it may use a borrower-based academic year versus a scheduled academic year to determine the frequency with which a given student may borrow?	_____	yes___no___
682.204(b),(e)	R. Is a system in place to prevent certifying loans in excess of aggregate loan limits?	_____	yes___no___
682.204(b),(e) DCL GEN-97-3	1. Is the institution aware that dependent undergraduate borrowers are eligible to borrow $23,000 in combined subsidized and unsubsidized loan amounts?	_____	yes___no___
682.204(b),(e) DCL GEN-97-3	2. Is the institution aware that independent undergraduate students (or dependent undergraduates whose parents are not eligible to borrow PLUS) are eligible to borrow a total of $46,000 in Federal Stafford loans, of which up to $23,000 may be subsidized?	_____	yes___no___
DCL GEN-97-3	a. Is the institution aware that if a borrower receives loans as an independent student in one or more years, and then becomes a dependent student, it should only include those portions of loans previously received that represent "base" loan amounts to determine the student's remaining aggregate eligibility?	_____	yes___no___

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Reference	Question	Responsible Office	Response
DCL GEN-97-3	b. Is the institution aware that if a dependent borrower was previously eligible for the independent borrower loan limits because his/her parent did not qualify for PLUS, and then becomes eligible for the lower dependent borrower limits because the parent becomes eligible for PLUS, it should only include those portions of loans previously received that represent "base" loan amounts to determine the student's remaining aggregate eligibility?	_____	yes___no___
682.204(b),(e) DCL GEN-97-3	3. Is the institution aware that graduate student borrowers are eligible to borrow a total of $138,500 in Federal Stafford loans (less any amounts borrowed as an undergraduate), of which up to $65,500 may be subsidized?	_____	yes___no___
682.204(b),(e)	4. Does the institution consider all amounts students have borrowed through the Federal Direct Stafford and Unsubsidized Stafford Loan programs, and the SLS program, when determining if aggregate loan limits have been reached?	_____	yes___no___
HEA, Section 428(d)(2) DCL GEN-96-14 "Dear Guaranty Agency Director" letter, 12/31/96 DCL GEN-97-4	S. Does the institution limit borrowing in excess of Unsubsidized Stafford annual loan limits to health professions students who: ▸ are enrolled at an institution that disbursed HEAL loans between 10/1/94 and 9/30/95; ▸ have not previously borrowed a HEAL loan; and ▸ meet all HEAL program eligibility requirements, (including full-time enrollment beginning with loans certified on 6/1/97)	_____	yes___no___ n/a___
	1. Does the institution only certify loans in excess of annual limits for loan periods beginning on or after 7/1/96?	_____	yes___no___ n/a___
	2. Does the institution limit the amount of supplementary borrowing to the amount	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
	students would be eligible to borrow under HEAL program loan limits?		
GEN-97-14	3. Is the institution aware that effective with the 1997-98 academic year, aggregate borrowing limits for these students have been increased to $189,125?	_____	yes___no___
682.603(b)(5)	T. Does the institution establish a disbursement schedule (for Federal Stafford *and* Federal PLUS loans) consistent with program requirements and regulatory cash management rules?	_____	yes___no___
668.167(a)(1)	1. Does the institution request the lender provide loan funds by EFT or master check no earlier than: ▸ 27 days after the first day of classes of the first payment period for a borrower who is enrolled in the first year of an undergraduate program and who has not previously received a Federal Stafford loan; and ▸ 13 days before the first day of classes for any subsequent payment period for a first-year, first-time Federal Stafford Loan program borrower, or for any payment period for all other borrowers?	_____	yes___no___
668.167(a)(2)	2. Does the institution request that the lender provide loan funds by check requiring the endorsement of the borrower no earlier than: ▸ the 1st day of classes of the first payment period for a borrower who is enrolled in the first-year of an undergraduate program and who has not previously received a Federal Stafford loan; or ▸ 30 days before the first day of classes for any subsequent payment period for a first-year, first-time Federal Stafford Loan program borrower, or for any payment period for all other borrowers?	_____	yes___no___

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Reference	Question	Responsible Office	Response
668.4, Payment period	U. Does the institution apply the concepts of "payment periods" when requesting second or subsequent disbursements of loan proceeds?	_____	yes___no___
682.604(b)(2)(i)	V. Before delivering loan proceeds, does the institution determine that the student has continuously maintained eligibility from the beginning of the loan period certified by the school on the student's loan application, including making satisfactory academic progress and, except in the case of late disbursements, at least half-time enrollment?	_____	yes___no___
682.604(b)(2)(iv)	1. Is the institution aware that if a student temporarily ceases to be enrolled at least half-time, but then resumes at least half-time enrollment, the student may receive the proceeds if he/she continues to qualify for the entire loan amount based on a reduced cost of attendance reflecting the reduced enrollment?	_____	yes___no___
1998-99 FSFA Handbook, p. 10-34	2. Is the institution aware that it may consider a student to have maintained eligibility, even if he/she delays attendance for up to the first 30 days of the loan period?	_____	yes___no___
682.604(f)(1)	W. Does the institution provide initial counseling to each student borrowing for the first time under the Federal Stafford Loan Program or Direct Loan Program, prior to releasing the first disbursement?	_____	yes___no___
682.604(f)(1)	1. Is the counseling given either in person, by audiovisual presentation, or by computer-assisted technology, and is someone with Title IV expertise reasonably available shortly after the counseling to answer questions?	_____	yes___no___
	a. Does the institution mail initial counseling materials to students enrolled in correspondence programs or in programs of study abroad?	_____	yes___no___
682.604(f)(2)	2. Does the initial counseling:		
	a. emphasize the seriousness and importance of the repayment obligation?	_____	yes___no___

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Reference	Question	Responsible Office	Response
	b. except for loans made or originated by the institution, emphasize the borrower's obligation to repay the full amount even if he/she does not complete the program, cannot obtain employment upon completion, or is otherwise dissatisfied with or does not receive the educational or other services that the borrower purchased from the school?	_____	yes___no___
	c. describe in forceful terms the likely consequences of default, including adverse credit reports and litigation?	_____	yes___no___
682.604(g)(4)	3. Are documents maintained in the student's file substantiating the counseling?	_____	yes___no___
682.604(c)(3)	X. If loan proceeds are transferred electronically or by master check from the lender to the institution, does the institution obtain an authorization from the borrower to credit the loan proceeds to the borrower's institutional account (unless the borrower already provided the authorization in the loan application)?	_____	yes___no___
	1. Is the authorization obtained no more than 30 days prior to the first day of classes of the loan period, to cover all installments for that loan period?	_____	yes___no___
682.207(b)(2)	Y. Does the institution understand that it may not obtain a borrower's power of attorney or other authorization to endorse or otherwise approve the cashing of a loan check or approve the release of EFT funds?	_____	yes___no___
682.207(b)(2)	1. Does the institution know that a borrower cannot provide this power of attorney or authorization to anyone else, *except* that a borrower in a study-abroad program *can* provide a power of attorney to an individual not affiliated with the institution?	_____	yes___no___
682.604(c)(5)	Z. Does the institution delay delivery of the first installment of a Federal Stafford Loan to first-year undergraduate borrowers who have not previously borrowed a Federal Stafford, SLS, or Direct Loan until 30 days after the first day of the student's program of study?	_____	yes___no___

Reference	Question	Responsible Office	Response
682.604(d)(3)	AA. Does the institution return proceeds to the lender no later than 30 days after the first day of the enrollment period, with explanation, if:		
	1. the student does not register for the period for which the loan was made?	_____	yes___no___
	2. the student does not begin attendance on a delayed basis?	_____	yes___no___
	3. a registered student withdraws or is expelled prior to the first day of classes for which the loan was made?	_____	yes___no___
	BB. Does the institution obey timely delivery rules:		
668.167(b)(1)(iii)	1. For a check made payable to the student alone: does the institution deliver the check to the student within 30 days of its receipt of funds (unless the student meets one of the conditions for delay)?	_____	yes___no___
668.167(b)(1)(i)	2. For funds received by EFT or master check: if the institution delivers proceeds directly to the borrower, does it do so within 10 business days of its receipt of funds (unless the student meets one of the conditions for delay)?	_____	yes___no___
668.604(c)(3)(ii)	3. If the institution credits proceeds received by EFT or master check to a student's account, does it deliver funds in excess of allowable costs to the borrower within: ▸ 14 days from when funds were credited, if the funds were credited to the student's school account after the first day of classes of a payment period; or ▸ 14 days after the first day of classes, if the funds were credited on or before the first day of classes of a payment period?	_____	yes___no___
	4. If eligibility issues cannot be resolved within applicable timeframes, does the institution return the proceeds to the lender?	_____	yes___no___

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Reference	Question	Responsible Office	Response
668.167(c)	a. Is the institution aware that it may delay returning FFEL program funds to a lender for up to 10 business days after the last day of the initial applicable timeframe, if funds are not delivered to a student because of failure of the student to satisfy programmatic requirements, and the institution expects the student to satisfy those requirements within that 10 business day period (conditional period)?	_____	yes___no___
668.167(c)	b. If the institution does not deliver FFEL program funds by the end of the initial or conditional period (as applicable), does it return those funds to the lender promptly, but no later than 10 business days from the last date of that applicable period?	_____	yes___no___ n/a___
1998-99 FSFA Handbook, p. 10-39	i. Does the institution understand that "promptly" means it may not delay initiating and completing its normal process for returning FFEL program funds to lenders?	_____	yes___no___
1998-99 FSFA Handbook, p. 10-40	ii. Is the institution aware that if a student becomes eligible for FFEL program funds during the return period, it may deliver those funds, provided the disbursement is made on or before the last day of the return period?	_____	yes___no___
668.164(f)(1)	CC. For credit-hour, term-based programs that are offered in semesters, trimesters, or quarters, does the institution ensure that loan proceeds are delivered no earlier than 10 days before the first day of classes of the payment period?	_____	yes___no___ n/a___
	DD. For credit hour programs that are not offered in semesters, trimesters, or quarters, does the institution ensure that loan proceeds are delivered no earlier than:		
668.164(f)(2)(i)	1. for first disbursements, for students not subject to delayed disbursements, 10 days	_____	yes___no___ n/a___

Reference	Question	Responsible Office	Response
	before the first day of classes of the payment period?		
668.164(f)(2)(ii)	2. for subsequent disbursements, the later of: • the calendar midpoint of the loan period; or • the date that the institution determines that the student completes half of the academic coursework of the loan period?	_____	yes___no___ n/a___
	EE. For clock hour programs, does the institution ensure that loan proceeds are delivered no earlier than:		
668.164(f)(2)(i)	1. for first disbursements, 10 days before the first day of classes of the payment period?	_____	yes___no___ n/a___
668.164(f)(2)(ii)	2. For subsequent disbursements, the later of: • the calendar midpoint of the loan period; or • the date that the institution determines that the student completed half of the clock hours of the loan period?	_____	yes___no___ n/a___
668.164(b)(3)	3. Is the institution aware that a limited number of excused absences may be included when determining if students have completed all of the clock hours of a prior payment period, if the institution has a written policy which addresses excused absences?	_____	yes___no___ n/a___
668.165(a)(2)	FF. When the institution delivers loan proceeds by crediting the student's institutional account, does it expeditiously notify the student or parent borrower in writing or by equivalent electronic means that it has done so?	_____	yes___no___
668.165(a)(3)(i)	1. Is the required notice sent no earlier than 30 days before and no later than 30 days after crediting the student's account?	_____	yes___no___
668.165(a)(3)(ii)	2. If it notifies the borrower electronically, does the institution require that the borrower confirm receipt of the notice?	_____	yes___no___

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Reference	Question	Responsible Office	Response
668.165(a)(3)(ii)	a. Does the institution maintain a record of that confirmation?	_____	yes___no___
668.165(a)(2)(ii)	3. If the institution receives FFEL proceeds through EFT or master check, does it notify the student or parent of their right to cancel all or a portion of the loan or loan disbursement?	_____	yes___no___
668.165(a)(3)(i)	a. Does the institution provide this notice no earlier than 30 days before and no later than 30 days after crediting the student's account?	_____	yes___no___
668.165(a)(2)(ii)	b. Does the notice inform the student or parent of the procedures and the timeframe by which the cancellation request must be received?	_____	yes___no___
682.604(e)	GG. Does the institution have in place policies and procedures to identify and handle late disbursements (i.e., disbursements received after the end of the loan period or before the end of the loan period but after the student has ceased to be enrolled at least half-time)?	_____	yes___no___
668.164(g)(2)(ii)(B)	1. Does the institution ensure that it does ***not*** deliver proceeds if the loan was *certified* after the student ceased to be enrolled at least half-time, notwithstanding any of the other rules concerning late disbursements?	_____	yes___no___
668.164(g)(2)(ii)(C)	2. If the borrower is subject to the 30-day delay (first-year undergraduates receiving their first Stafford Loan), does the institution deliver a late *first* disbursement only if the student's last recorded date of attendance is after the 30th day of the loan period?	_____	yes___no___
668.164(g)(2)(ii)(B)	3. Is a late *second or subsequent* disbursement delivered to the borrower only if the student has graduated or successfully completed the period of enrollment for which the loan was intended?	_____	yes___no___
668.164(g)(3)	4. Does the institution deliver eligible late disbursements of loan proceeds to the	_____	yes___no___

Reference	Question	Responsible Office	Response
	borrower no later than 90 days after the date the student became ineligible?		
682.604(e)(2)	5. If the total amount of the late disbursement *exceeds* the student's documented incurred educational costs, does the institution return the balance of the loan proceeds to the lender with a notice certifying the beginning and ending dates of the period during which the borrower was enrolled at the school as an eligible student during the loan period, and the corrected financial need for the loan for that period?	_____	yes___no___
682.604(h)	HH. Does the institution have procedures to identify and resolve Stafford loan overawards (i.e., when the institution discovers *before* delivering a disbursement that the student has or will have financial aid for the loan period that exceeds the amount for which he/she is eligible)?	_____	yes___no___
682.604(h); 1998-99 FSFA Handbook, p. 2-67	1. If the institution discovers an overaward after proceeds are received (but not yet delivered) does the institution reduce or eliminate the overaward by either: • using the student's unsubsidized Stafford, PLUS, state-sponsored, or private loan to cover the EFC, if not already done; and/or • returning the entire disbursement to the lender and requesting a new check for the portion for which the student is eligible; or • delivering the portion for which the student is eligible, and returning the ineligible portion to the lender?	_____	yes___no___
1998-99 FSFA Handbook, p. 2-67	a. If the institution chooses to disburse the entire first disbursement because the overaward can be eliminated by reducing or canceling subsequent disbursements, does the institution inform the lender of the reduced award and request cancellation or reduction of the subsequent disbursements?	_____	yes___no___ n/a___

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Reference		Question	Responsible Office	Response
682.604(h)(3)(i)		2. Does the institution exclude from the overaward determination any FWS funds that do not exceed the student's need by more than $300?	_____	yes___no___
682.610(c)(2)(iv)	II.	When the institution discovers that an enrolled FFEL borrower has changed his or her permanent address, does the institution notify the holder of the loan within 30 days, either directly or through the guaranty agency?	_____	yes___no___
668.43(c)(6) 682.604(g)(1)	JJ.	Does the institution provide in-person exit counseling to each Federal Stafford Loan borrower shortly before the borrower ceases at least half-time study?	_____	yes___no___
682.604(g)(2)		1. Does the exit counseling give information about: ▸ average anticipated monthly repayments based on the average indebtedness of all students (✦ or on a student's actual indebtedness); ▸ repayment options (such as loan consolidation and refinancing); ▸ debt management strategies; ▸ deferment and cancellation conditions; and	_____	yes___no___
		2. Does exit counseling repeat the information given during initial counseling?		
682.604(g)(2)(vi)		3. Is the borrower required to update his/her name, address, driver's license number, Social Security Number, and references?	_____	yes___no___
682.604(g)(2)(vi) 1998-99 FSFA Handbook, p. 10-89		4. Is the borrower required to supply his/her expected permanent address after leaving school, and the name and address of his/her expected employer and next of kin?	_____	yes___no___
		5. Does the institution mail exit counseling information to students:		
682.604(g)(1)(ii)		▸ within 30 days after learning the student has dropped out or left without attending exit counseling?	_____	yes___no___

Reference	Question	Responsible Office	Response
682.604(g)(1)(i)	▸ within 30 days after a borrower completes a correspondence program?	_____	yes___no___ n/a___
1998-99 FSFA Handbook, p. 10-88	a. Is the borrower asked to provide information that would be collected during the in-person exit counseling?	_____	yes___no___
682.604(g)(4)	6. Does the institution maintain documents in the student's file substantiating that the counseling has been performed?	_____	yes___no___
682.604(g)(2)(vi)	7. Does the institution provide the information collected from the borrower during exit counseling to the guaranty agencies listed in the borrower's records within 60 days?	_____	yes___no___
682.605(a)	KK. For a student who does not return after summer break, does the institution determine the student's withdrawal date no later than 30 days after the first day of the next scheduled term?	_____	yes___no___
682.605(b)	1. For other withdrawing students, does the institution report to the lender the student's date of withdrawal (month, day, and year) as determined under the General Provisions refund regulations?	_____	yes___no___
682.607(c)	LL. Does the institution pay a refund to the lender within the following applicable timeframe?	_____	yes___no___
	1. Within 60 days of the earlier of:	_____	yes___no___
	▸ the date the student officially withdraws or is expelled; or		
	▸ the date the institution determines the student was unofficially withdrawn; or		
	▸ for a student who does not return from an approved leave of absence (LOA), within 30 days of the earlier of the date the leave of absence expires or the date the student notifies the institution that he/she will not be returning to the institution after the leave of absence?		
682.607(a)(1)	2. Does the institution pay the refund to the original lender or a subsequent holder if the	_____	yes___no___

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Reference	Question	Responsible Office	Response
	loan was transferred and the institution knows the new holder's identity?		
682.607(a)(2)	3. Does the institution provide simultaneous written notice to the borrower when it has paid a refund to the lender?	_____	yes___no___
682.604(d)(4)	MM. If the school cannot document that a registered student attended during the loan period, does the institution notify the lender, within 30 days after determining that the student never attended, of the student's failure to attend school and return to the lender: ▸ any loan proceeds credited directly by the school to the student's account; and ▸ the amount of payments made directly by the student to the school, to the extent that they do not exceed the amount of any loan proceeds delivered to the student?	_____	yes___no___
682.610(a)(3)	NN. Are all required reports submitted on a timely basis?	_____	yes___no___
682.610(c)(1) DCL GEN 96-17	1. Does the institution complete and return Student Status Confirmation Reports (SSCRs) to the National Student Loan Data System (NSLDS) within 30 days of receipt? *NOTE: Beginning in March of 1997, all SSCR information must be reported to the National Student Loan Data System (NSLDS).*	_____	yes___no___
682.610(c)(2) 1998-99 FSFA Handbook, p. 10-113	2. If the institution does not expect to submit an SSCR within 60 days of learning that a student's enrollment status has changed, and that change would normally be reported on the SSCR, does the institution notify the guaranty agency or lender *within 30 days*?	_____	yes___no___
682.610(a)(2)	OO. Does the institution maintain, for each FFEL Loan received by or on behalf of its students, a copy of the loan application or data submitted	_____	yes___no___

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Reference	Question	Responsible Office	Response
	electronically to the lender which can, upon request, be produced in hard copy or other media format acceptable to the Secretary?		
682.610(b) 668.24(c)	1. Does the institution maintain the following records for each FFEL loan received by or on behalf of its students:		
	▸ Name and address of the lender?	_____	yes___no___
	▸ Loan amount and enrollment period for which the loan was intended?	_____	yes___no___
	▸ For loans delivered by check, the date the institution endorsed each loan check, if applicable?	_____	yes___no___ n/a___
	▸ Date or dates of delivery of the loan proceeds by the school to the student or parent borrower?	_____	yes___no___
	▸ For loans delivered by electronic funds transfer (EFT); a copy of the student's written authorization to deliver the initial and subsequent disbursements of each loan?	_____	yes___no___ n/a___
	▸ Documentation of the student or parent borrower's eligibility for FFEL funds?	_____	yes___no___
	▸ The calculation used to determine loan eligibility?	_____	yes___no___
	▸ Documentation of and information collected at any initial or exit loan counseling?	_____	yes___no___
	▸ The amount, date, and basis of the calculation of any refund or overpayment paid to or on behalf of a student?	_____	yes___no___
	▸ Any other record required for the school to document its compliance with applicable requirements with respect to the loan?	_____	yes___no___
668.24(e)(2)(ii)	2. Unless questioned by an audit, program review, investigation, or other review, does the institution maintain records and copies of reports for three years from the end of	_____	yes___no___

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Reference	Question	Responsible Office	Response
	the award year in which the records are submitted? *NOTE: Minimum record retention requirements were changed to three years as a result of statutory amendments made by the Improving America's Schools Act of 1994. In February, 1996, ED issued guidance making the three-year period applicable to all records, regardless of when the records were established.*		
668.24(e)(2)(i)	3. Unless questioned by an audit, program review, investigation, or other review, does the institution maintain records relating to a student or parent borrower's eligibility and participation in the FFEL or Direct Loan program for three years after the end of the award year in which the student last attended the institution?	_____	yes___no___
682.610(e)(3)	a. Does the institution keep all records involved in any loan, claim, or expenditure questioned by a Title IV audit, program review, investigation, or other review until the later of: ▸ the resolution of the questioned loan, claim, or expenditure; or ▸ the end of the retention period applicable to the record?	_____	yes___no___
668.610(f)(4)	4. Does the institution promptly respond to requests to provide a lender or guaranty agency with any information it has about the last known address, surname, employer, and employer address of a borrower who attends or has attended the institution?	_____	yes___no___
	PP. If the institution is participating as a school lender under the FFEL program, does it comply with the provisions outlined above and with provisions applicable only to institutions if they are lenders, some of which are listed below?		
682.200, School lender	1. Has the institution entered into an agreement with a guaranty agency to	_____	yes___no___

Reference	Question	Responsible Office	Response
	permit it to make or originate loans under the FFEL program?		
682.601(a)	2. Does the institution employ at least one person whose full time responsibilities are limited to the administration of financial aid programs for the institution's students?	_____	yes___no___
		_____	yes___no___
682.601(a)(6)	3. Is the institution's default rate 15% or less?	_____	yes___no___
682.601(a)(3)	4. Does the institution ensure that it does not make or originate loans that would be outstanding to or on behalf of more than 50% of the undergraduate students attending at least half-time (unless this requirement is waived by ED)?	_____	yes___no___
682.601(a)(4)	5. Are all applicants who have not previously received a loan made or originated by the school informed that they must make a good faith effort to obtain a loan through a commercial lender?	_____	yes___no___
682.601(a)(5) 682.601(b)	a. Does the institution require an applicant who has not previously received a loan made or originated by the school to provide evidence of denial of a loan (as defined in regulation) by a commercial lender for the same academic period?	_____	yes___no___
682.305	6. Does the institution submit the periodic reports necessary to receive interest benefits and special allowance payments?	_____	yes___no___
682.601(a)(7)	7. Except for reasonable administrative expenses directly related to the FFEL program, does the institution use interest subsidy and special allowance payments for need-based grant programs for its students?	_____	yes___no___
682.206 - .211; 682.411	8. Does the institution follow due diligence requirements for making, disbursing, and servicing loans, and for collecting, deferring, or forbearing loans, including but not limited to the provisions listed below?	_____	yes___no___
682.207(c)	a. Does the institution adhere to the multiple disbursement provisions?	_____	yes___no___

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Reference	Question	Responsible Office	Response
682.206(d)(1),(2)	b. Is the promissory note used by the institution an executed legally-enforceable promissory note to which the institution has made no changes?	_____	yes___no___
682.206(d)(3)	c. Does the institution give a copy of the executed note to the borrower?	_____	yes___no___
682.209(a)	d. Does the institution ensure that each borrower is afforded the appropriate grace period prior to repayment?	_____	yes___no___
682.209(a)(7),(c)	e. Are minimum/maximum repayment period rules and minimum repayment amount requirements observed?	_____	yes___no___
682.205(a)	9. Does the institution provide required disclosures to borrowers in writing before or at the time of the borrower's first disbursement on a FFEL Loan?	_____	yes___no___
682.209(h)(6)(i)	10. Does the institution treat a refund of institutional charges as a credit against the principal amount owed by the borrower?	_____	yes___no___
682.414(a)(4)	11. Does the institution maintain complete and accurate records of each loan account as required of lenders, in a system that allows ready identification of each loan's current status?	_____	yes___no___
682.414(a)(4)(ii)	12. Does the institution retain the original promissory note until the loan is paid in full or assigned to ED?	_____	yes___no___
	a. When repayment is complete, does the institution return the actual note to the borrower (or notify the borrower that the loan is paid in full under an alternate procedure that is acceptable under state law) and retain a copy for the prescribed period?	_____	yes___no___
682.202	13. Are restrictions on permissible charges to borrowers observed, and the correct interest rate assessed?	_____	yes___no___
682.202(c)(4) 682.401(b)(10)(iii)	14. Are origination fees and insurance fees	_____	yes___no___

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	deducted from the loan proceeds proportionately?		
682.412(a)	15. Does the institution comply with required actions in cases where the borrower (or student on whose behalf the parent borrowed) provided erroneous information that caused the borrower to be ineligible for all or part of a FFEL Loan or receive interest benefits for which he or she was not eligible?	_____	yes___no___

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Other Recommended Good Practices for the Administration of the FFEL Program

Practice **Comments**

1. The institution should be familiar with the rights and responsibilities of the borrower [Section 682.205(a)], and should include this information in its loan counseling.

   NOTE: The lender is responsible for informing the borrower in writing of his/her rights and responsibilities.

2. The institution should ensure that the student has explored all other sources of aid, and should caution the student to borrow the minimum amount needed.

3. Students should be encouraged to consider what the amount of their monthly repayments will be, as well as what their income is likely to be.

4. The institution, even if it is not a lender, should include in the exit interview with Federal Stafford borrowers, information regarding deferment provisions.

5. The institution should emphasize the importance of maintaining complete, accurate, and up to date information about their loans to students.

6. Institutions that are lenders should attempt to meet with the borrower to ensure that he/she understands his/her rights and obligations before making an initial disbursement.

Comments on the Administration of the FFEL Program _____

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VIII. William D. Ford Direct Loan Program

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
668.16(m) 668.17(a),(b)	A. Does the institution understand the impact of its Direct Loan cohort default rate on institutional eligibility to participate in:		
	1. the Direct Loan and FFEL Programs?	_____	yes___no___
	2. all Title IV programs?	_____	yes___no___
685.300(b)(9)	B. Has the institution implemented a quality assurance plan to ensure compliance with program requirements?	_____	yes___no___
●685.301(a)(7) ✦685.301(a)(8)	C. Does the institution understand that it may not assess a fee for origination activities, or for providing information necessary to receive a Direct Loan or any benefits associated with a Direct Loan?	_____	yes___no___
685.200(a), (c)	D. Does the institution ensure that student borrowers and, in the case of a Direct PLUS loan, both the parent and the student meet all eligibility requirements?	_____	yes___no___
685.200(c) 685.102(b)	1. In the case of a student or parent borrower who is currently in default on a FFEL or Direct Loan, does the institution ensure that the borrower has made satisfactory repayment arrangements on the defaulted loan as defined in regulation?	_____	yes___no___
685.200(a)(i)	2. Does the institution originate a loan only if the student will be enrolled at least half-time?	_____	yes___no___
	3. Does the institution hold as *ineligible* for Direct Loans students who:		
668.32(c)(2)(i)	a. are incarcerated?	_____	yes___no___
685.204(b)(1)(ii) 1998-99 FSFA Handbook, p. 11-7	b. are serving in a medical internship or residency program (other than dentistry), unless it is part of the degree program?	_____	yes___no___ n/a___
685.200(a)(1)(iv) 1998-99 FSFA Handbook, p. 11-7	4. Is the institution aware that if a borrower's previous Direct or FFEL loan was canceled due to total permanent disability, the borrower:	_____	yes___no___

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Reference	Question	Responsible Office	Response
	▸ must obtain a physician's certification that he/she is able to engage in substantial gainful activity; and		
	▸ must waive future cancellation based on the disability unless it substantially deteriorates?		
DCL DLB-96-2 Q&A #5	a. Does the institution send these certifications to the Loan Origination Center, and retain copies in student files?	_____ _____	yes___no___ n/a___
685.200(b)(2)	5. For counseling purposes, is the institution familiar with credit history requirements for parent borrowers?	_____	yes___no___
DCL DLB-96-2, Q&A #17	a. Is the institution aware that a student may no longer be an endorser on a Direct PLUS loan?	_____	yes___no___
668.2, Parent 685.200(b)(2) 1998-99 FSFA Handbook, p. 11-8	E. Does the institution understand the definition of parent, and realize that a stepparent is an eligible PLUS borrower if his/her income and assets would have been taken into account when calculating the student's expected family contribution, even if the stepparent is not a legal guardian or adoptive parent?	_____	yes___no___
685.200(a)(1)(iii)	F. Does the institution have in place a means of determining Federal Pell Grant eligibility or ineligibility and ensuring that eligible students apply for the Federal Pell Grant prior to certifying a Federal Direct Stafford application?	_____	yes___no___
685.203(c)(1)(ii), (iii)	G. If, due to exceptional circumstances, a dependent student's parents will likely be precluded from borrowing PLUS, and cannot otherwise provide the EFC, does the institution document its determination that a student may borrow a Direct Unsubsidized loan?	_____	yes___no___
685.203(c)(1)(iii)	1. Does the institution recognize that a parent's refusal to borrow a PLUS loan does not constitute an exceptional circumstance?	_____	yes___no___
●685.301(a)(6) ✦685.301(a)(7)	H. Does the institution understand its right to refuse to originate loans and to reduce the borrower's determination of need for student or parent borrowers?	_____	yes___no___

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Reference		Question	Responsible Office	Response
●685.301(a)(6)(i) ✦685.301(a)(7)(i)	1.	Does the institution make such judgments only on a case-by-case basis?	_____	yes___no___
●685.301(a)(6)(ii) ✦685.301(a)(7)(ii)	2.	Is the documentation supporting such a decision retained in the student's file?	_____	yes___no___
●685.301(a)(6) ✦685.301(a)(7)	3.	Does the institution provide in writing to the borrower its reasons for declining to certify a Direct Loan, or for reducing the amount of the loan?	_____	yes___no___
●685.301(a)(6)(iii) ✦685.301(a)(7)(iii)	4.	Does the institution ensure that it does not engage in any discriminatory practice based on the borrower's race, sex, color, religion, national origin, age, handicapped status, or income?	_____	yes___no___
●DCL DLB-96-2, Q&A #7	I.	●Is the institution aware that it may establish minimum loan amounts, and that borrowers with need of less than the minimum amount may receive a Direct Unsubsidized loan which includes that amount as part of a Direct Unsubsidized loan?	_____	yes___no___
✦685.301(a)(6)	J.	✦Is the institution aware that it may chose not to originate a Direct Subsidized loan for a student with need of $200 or less and instead may include that amount as part of a Direct Unsubsidized loan?	_____	yes___no___
685.200(a)(2)(i) 685.102(b), Estimated financial assistance, (1)	K.	Has the institution established procedures to calculate accurately the assistance the student *will receive* from Federal, State, institutional, or other sources, such as scholarships, grants, loans, and need-based employment, including but not limited to Federal Pell Grant, campus-based funds, Veterans or other educational benefits, and ROTC?	_____	yes___no___
685.102(b), Estimated financial assistance, (2)	1.	Does the institution ***exclude*** from estimated financial assistance:		
		a. any amounts used to replace the expected family contribution from unsubsidized Federal Stafford, Direct Unsubsidized, PLUS, state-sponsored, or private loans?	_____	yes___no___
		b. any Federal Perkins or FWS awards that	_____	yes___no___

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Reference		Question	Responsible Office	Response
		the student declined or for which the student did not apply?		
		c. for a Direct PLUS application, the amount of unsubsidized Stafford loan for which a student would be eligible, if the parent is electing to borrow that amount instead of having the student borrowing it?	_____	yes___no___
685.102(b), Period of enrollment	L.	Does the institution originate loans for periods that coincide with a bona fide academic term established by the school for which institutional charges are generally assessed (e.g., semester, trimester, quarter, length of the student's program or academic year)?	_____	yes___no___
685.301(a)(3) 685.203	M.	Are procedures in place to ensure that a loan will not be originated for an amount that exceeds the lesser of the student's need (estimated cost of attendance minus estimated financial assistance, and, in the case of subsidized Stafford loans, minus the expected family contribution), or applicable annual loan limits?	_____	yes___no___
685.203(a)(1),(2),(3) 685.203(c)(2)	N.	Does the institution observe the reduced annual Direct Stafford Loan limits (subsidized and unsubsidized) for undergraduates enrolled in:		
		1. a program that is less than a full academic year in length?	_____	yes___no___ n/a___
		2. the final portion of a program longer than an academic year, if that portion is less than an academic year in length?	_____	yes___no___
685.301(a)(4)(ii)	O.	Does the institution realize that it need not recalculate the amount of the loan if the number of hours for which an eligible student is enrolled changes after the school certifies the loan?	_____	yes___no___
DCL DLB-96-2, Q&A #8	P.	If the institution chooses to limit the number of times a student may receive an annual loan limit for a given grade level, does it apply the policy consistently, and not on a case-by-case basis?	_____	yes___no___
685.203(h); 1998-99 FSFA	Q.	Does the institution understand the requirements pertaining to the period to which annual loan	_____	yes___no___

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Reference		Question	Responsible Office	Response
Handbook, pp. 11-22-25		limits apply, and when it may use a borrower-based academic year versus a scheduled academic year to determine the frequency with which a given student may borrow?		
685.203(d)	R.	Is a system in place to prevent certifying loans in excess of applicable aggregate loan limits?	_____	yes___no___
685.203(d)(1) DCL GEN-97-3		1. Is the institution aware that dependent undergraduate borrowers are eligible to borrow $23,000 in combined subsidized and unsubsidized loan amounts?	_____	yes___no___
685.203 (d),(e) DCL GEN-97-3		2. Is the institution aware that independent undergraduate borrowers (or dependent undergraduate borrowers whose parents do not qualify for PLUS) are eligible to borrow a total of $46,000 in Federal Direct Stafford Loans, of which up to $23,000 may be subsidized?	_____	yes___no___
DCL GEN-97-3		a. Is the institution aware that if a borrower receives loans as an independent student in one or more award years, and then becomes a dependent student, it should only include those portions of the loans previously received that represent "base" loan amounts to determine the student's remaining aggregate eligibility?	_____	yes___no___
DCL GEN-97-3		b. Is the institution aware that if a dependent borrower was previously eligible for the independent loan limits because his/her parent did not qualify for PLUS and then becomes eligible for the lower dependent borrower limits because the parent becomes eligible for PLUS, it should only include those portions of loans previously received that represent "base" loan amounts to determine the student's remaining aggregate eligibility?	_____	yes___no___
685.203 (d),(e) DCL GEN-97-3		3. Is the institution aware that graduate borrowers may borrow a total of $138,500 in Federal Direct Stafford Loans (less any amounts borrowed as an undergraduate) of which up to $65,500 may be subsidized loans?	_____	yes___no___

DIRECT LOANS

Reference	Question	Responsible Office	Response
685.203 (d),(e)	4. Does the institution consider amounts students have borrowed through the FFEL program, including SLS loans, when determining if aggregate loan limits have been reached?	_____	yes___no___
HEA, Section 428(d)(2) DCL GEN-96-14 DCL GEN-97-4 DCL DLB-97-1	S. Does the institution limit borrowing in excess of Direct Unsubsidized Stafford annual loan limits to health professions students who: ▸ are enrolled at an institution that disbursed HEAL loans between 10/1/94 and 9/30/95; ▸ have not previously borrowed a HEAL loan; and ▸ meet all HEAL program eligibility requirements, including full-time enrollment (beginning with loans certified on or after 6/1/97)?	_____	yes___no___ n/a___
DCL GEN-97-4	1. Does the institution only certify loans in excess of annual limits for loan periods beginning on or after 7/1/96?	_____	yes___no___ n/a___
	2. Does the institution limit the amount of supplementary borrowing to the amount students would be eligible to borrow under HEAL program loan limits?	_____	yes___no___ n/a___
DCL GEN 97-14	3. Is the institution aware that beginning with the 1997-98 academic year, aggregate borrowing limits for these students have been increased to $189,125?	_____	yes___no___
685.301(b)(2)	T. Does the institution establish a disbursement schedule (for Direct Stafford *and* Direct PLUS loans) consistent with program requirements and regulatory cash management rules?	_____	yes___no___
685.301(b)(3) 668.4, payment period	U. Does the institution apply the concept of "payment periods" when requesting second or subsequent disbursements of loan proceeds?	_____	yes___no___
685.202(c)	V. Is the institution aware that borrowers are charged a 4% loan fee, which is deducted from each disbursement of the loan proceeds?	_____	yes___no___

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Reference	Question	Responsible Office	Response
685.301(a)(5)	W. Is the institution aware that the date of loan origination is the date the institution creates the electronic loan origination record?	_____	yes___no___
668.164(a) 1998-99 FSFA Handbook, p. 3-62	X. Is the institution aware that the disbursement date is the date the institution credits a student's institutional account or pays the student directly with: ▸ funds received from the Secretary; or ▸ institutional funds used in advance of receipt of Title IV funds?	_____	yes___no___
668.164(b) 1998-99 FSFA Handbook, p. 3-63	1. Is the institution aware that if, in advance of receipt of Title IV funds, institutional funds are credited to a student's tuition account earlier than is allowable, the funds will be considered disbursed on the earliest allowable day?	_____	yes___no___
FR, 11/29/96, p. 60588 1998-99 FSFA Handbook, p. 3-62	2. Is the institution aware that if institutional funds are credited to a student's account in anticipation of receipt of Title IV funds, but those funds are not identified as Direct Loan funds, then a Direct Loan disbursement is not considered to have been made?	_____	yes___no___
685.301(b)(1)	Y. Does the institution verify, before disbursing a loan, that the borrower and, if applicable, the student, has provided all necessary information for the loan application, and for the promissory note if the institution originates the loan?	_____	yes___no___ n/a___
685.301(c)(2)	1. If it collects promissory notes, does the institution provide the Direct Loan Servicer an executed, legally enforceable promissory note as proof of the borrower's indebtedness?	_____	yes___no___ n/a___
685.300(b)(5)	Z. Does the institution provide the Direct Loan Servicer with timely and accurate information for servicing and collecting loans?	_____	yes___no___
685.301(d)	AA. Does the institution submit to the Direct Loan Servicer, within 30 days following the date of disbursement, the following records:	_____	yes___no___

Reference	Question	Responsible Office	Response
	▸ promissory note (if the institution collects promissory notes);		
	▸ loan origination record; and		
	▸ initial and subsequent disbursement records?		
1997-98 Direct Loan School Guide, p. 5-2	BB. Does the institution understand that loan origination records must be submitted while the student meets all loan eligibility requirements?	_____	yes___no___
1997-98 Direct Loan School Guide, p. 5-11	CC. If the institution prints promissory notes, when the amount of a student's loan increases after the promissory note has been printed, does the institution print a new promissory note covering the incremental difference?	_____	yes___no___ n/a___
1997-98 Direct Loan School Guide, p. 5-11	1. If a new note is prepared based on the new total amount, does the institution cancel the old note?	_____	yes___no___. n/a___
	DD. Does the institution disburse funds only to a student for whom:	_____	yes___no___
685.303(b)(1)(i)	▸ it has received a legally enforceable promissory note, if the institution initiates the drawdown; or		
685.303(b)(1)(ii)	▸ it has received funds from the Servicer, if the institution does not initiate drawdown of funds?		
DCL DLB-96-5 1998-99 FSFA Handbook, p. 3-63	1. Is the institution aware that it may give its own funds to a Direct Loan borrower more than 10 days prior to the first day of classes, but in that case it may not report the disbursement as a Direct Loan disbursement until no earlier than 10 days prior to the first day of classes?	_____	yes___no___
DCL DLB-96-5	a. Does the institution understand that it may not receive any interest payments either from the Department of Education or from the student for the period of time between the date the disbursement of institutional funds is made and the date the institution receives federal funds to reimburse itself for that disbursement?	_____	yes___no___

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Reference	Question	Responsible Office	Response
1997-98 Direct Loan School Guide, p. 6-11	EE. If the institution initiates drawdown of funds, is it aware that funds drawn down for one eligible borrower may be disbursed to another eligible borrower?	_____	yes___no___ n/a___
1997-98 Direct Loan School Guide, p. 6-11	FF. If the institution does not initiate drawdowns, does it ensure that funds are disbursed only to the borrower for whom they were intended, according to the disbursement roster?	_____	yes___no___ n/a___
668.166(b)(1) 1998-99 FSFA Handbook, p. 3-74	1. Does the institution return funds for a student found to be ineligible within 3 days of receipt of those funds, unless the student will become eligible, and the institution will disburse the funds, within an additional 7 days?	_____	yes___no___
685.303(b)(2)(i)	GG. Before disbursing loan proceeds, does the institution determine that students have continuously maintained eligibility from the beginning of the loan period certified by the school on the loan application, including, except in the case of late disbursements, at least half-time enrollment?	_____	yes___no___
685.303(b)(2)(iv)	1. Is the institution aware that if a student temporarily ceases to be enrolled at least half-time but then resumes at least half-time enrollment, the student may receive the proceeds if he/she continues to qualify for the entire loan amount based on a reduced cost of attendance reflecting the reduced enrollment?	_____	yes___no___
685.303(b)(2)(iv)	a. Does the institution document the student's resumption of at least half-time enrollment and the revised cost of attendance in the student's file?	_____	yes___no___
685.303(b)(2)(ii)	2. Is the institution aware that it may consider a student as having maintained eligibility even if he/she delays attendance for up to the first thirty days of the loan period?	_____	yes___no___
685.303(b)(4)	HH. Does the institution delay delivery of the first installment of a Direct Loan to first-year undergraduate borrowers who have not previously borrowed a Direct or FFEL loan until	_____	yes___no___

Reference	Question	Responsible Office	Response
	30 days after the first day of the student's program of study?		
DCL DLB-96-2, Q&A #16 1998-99 FSFA Handbook, p. 3-68	II. If the institution credits student accounts with Direct PLUS proceeds, does the institution release excess Direct PLUS Loan proceeds (not needed to cover institutional charges) to the student for whom the parent borrowed only if the parent borrower authorizes it?	_____	yes___no___
685.303(c)	JJ. Does the institution ensure that Direct Loan funds are disbursed to a student or parent borrower within the time frames established under the cash management rules?	_____	yes___no___
685.303(c) 668.164(f)(1)	KK. For credit-hour, term-based programs that are offered in semesters, trimesters, or quarters, does the institution ensure that loan proceeds are delivered no earlier than 10 days before the first day of classes of the payment period?	_____	yes___ no___ n/a___
	LL. For credit-hour programs that are not offered in semesters, trimesters, or quarters, does the institution ensure that loan proceeds are delivered no earlier than:		
668.164(f)(2)	1. For first disbursements, for students not subject to delayed disbursement requirements, 10 days before the first day of classes of the payment period?	_____	yes___no___ n/a___
685.301(b)(5)	2. For subsequent disbursements, the later of:		
	▸ the calendar midpoint of the loan period; or	_____	yes___no___ n/a___
	▸ the date that the institution determines that the student completes half of the academic coursework of the loan period?	_____	yes___no___ n/a___
	MM. For clock hour programs, does the institution ensure that loan proceeds are delivered no earlier than:		
668.164(f)	1. For first disbursements, for students not subject to delayed disbursement requirements, 10 days before the first day of classes of the payment period?	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
685.301(b)(6)	2. For subsequent disbursements, the later of:		
	▸ the calendar midpoint of the loan period; or	_____	yes___no___ n/a___
	▸ the date that the institution determines that the student completed half of the clock hours of the loan period?	_____	yes___no___ n/a___
668.164(b)(3)	3. Is the institution aware that a limited number of excused absences may be included when determining if students have completed all of the clock hours of a prior payment period, if the institution has a written policy which addresses excused absences?	_____	yes___no___ n/a___
668.165(a)(2)	NN. When the institution disburses loan proceeds by crediting the student's institutional account, does it expeditiously notify the student or parent borrower in writing, or by equivalent electronic means that it has done so?	_____	yes___no___
668.165(a)(3)(i)	1. Is the required notice sent no earlier than 30 days before and no later than 30 days after crediting the student's account?	_____	yes___no___
668.165(a)(3)(ii)	2. If it notifies the borrower electronically, does the institution request the borrower to confirm the receipt of the notice?	_____	yes___no___
668.165(a)(3)(ii)	a. Does the institution maintain a record of that confirmation?	_____	yes___no___
668.165(a)(2)(ii)	3. Does the institution notify the student or parent borrower of their right to cancel all or a portion of the loan or loan disbursement?	_____	yes___no___
668.165(a)(3)(i)	a. Does the institution provide this notice no earlier than 30 days before and no later than 30 days after crediting the student's account?	_____	yes___no___
668.165(a)(2)(ii)	b. Does the notice inform the student or parent of the procedures and the timeframe by which the cancellation request must be received?	_____	yes___no___
685.303(d)	OO. Does the institution have in place policies and	_____	yes___no___

Reference	Question	Responsible Office	Response
	procedures to identify and handle late disbursements (i.e., disbursements received after the end of the loan period or before the end of the loan period but after the student has ceased to be enrolled at least half-time)?		
668.164(g)(2)(ii)(A)	1. Does the institution ensure that it does ***not*** deliver proceeds if the loan was *originated* after the student ceased to be enrolled at least half-time, notwithstanding any of the other rules concerning late disbursements?	_____	yes___no___
668.164(g)(2)(ii)(C)	2. If the borrower is subject to the 30-day delay (first-year undergraduates receiving their first Federal Stafford Loan), does the institution deliver a late *first* disbursement only if the student's last recorded date of attendance is after the 30th day of the loan period?	_____	yes___no___
668.164(g)(2)(ii)(A)	3. Is a late *second or subsequent* disbursement delivered to the borrower only if the student successfully completed the period of enrollment for which the loan was intended?	_____	yes___no___
668.164(g)(3)	4. Is an eligible late disbursement only made for up to the amount of the student's documented educational costs for the portion of the enrollment period actually completed by the student?	_____	yes___no___
668.164(g)(3)	5. Does the institution disburse eligible late disbursement loan proceeds to the borrower not later than 90 days after the date that the student became ineligible?	_____	yes___no___
685.303(e) 1998-99 FSFA Handbook, pp. 2-67-68	PP. If, before disbursing a Direct Subsidized Loan or Direct Unsubsidized Loan, the institution learns that the borrower will receive or has received additional financial aid that exceeds the amount of assistance for which the student is eligible, does the school reduce or eliminate the overaward by either: ▸ using the student's Direct Unsubsidized, Direct PLUS, state-sponsored, or private loan to cover the expected family contribution; and/or	_____	yes___no___

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Reference	Question	Responsible Office	Response
	▸ canceling the loan, returning the full disbursement, and originating a new loan for a lower amount; or ▸ delivering the portion of the loan that the student is eligible for, and returning only the ineligible portion?		
685.304(a)(1)	QQ. Does the institution provide to each Direct Loan borrower, initial counseling prior to the release of the initial disbursement of the borrower's first Direct Loan, unless the student received a previous Direct or FFEL loan?	_____	yes___no___
685.304(a)(2)	1. Is the counseling given either in person, by audiovisual presentation, or by computer-assisted technology, and is someone with Title IV expertise reasonably available shortly after the counseling to answer questions?	_____	yes___no___
	a. Does the institution mail initial counseling materials to students enrolled in correspondence programs or in programs of study abroad?	_____	yes___no___
685.304(a)(3)	2. Does the initial counseling:		
	a. emphasize the seriousness and importance of the repayment obligation?	_____	yes___no___
	b. describe in forceful terms the likely consequences of default, including adverse credit reports and litigation?	_____	yes___no___
	c. Provide general information about average indebtedness and average monthly repayment of Direct Loan student borrowers at the institution or in the student's program of study?	_____	yes___no___
685.304(b)(4)	3. Are documents substantiating the counseling maintained in the student's file?	_____	yes___no___
685.304(b)(1)	RR. Does the institution provide in-person exit counseling to each Direct Loan student borrower shortly before the borrower ceases at least half-time study at the institution?	_____	yes___no___

DIRECT LOANS

Reference	Question	Responsible Office	Response
685.304(b)(1)(i)	1. For correspondence students: does the institution mail exit counseling materials to the borrower within 30 days after the borrower completes the program?	_____	yes___no___ n/a___
685.304(b)(1)(ii)	2. For students who fail to attend an exit interview or leave without the institution's knowledge: is the information required for exit interviews mailed to the student's last known address within 30 days after the institution learns the student left or failed to attend a scheduled interview?	_____	yes___no___
685.304(b)(2)	3. During exit counseling does the institution supply the student with information regarding:		
685.304(b)(2)(i)	a. The student's average anticipated monthly repayment based on the student's indebtedness (✦or on the average indebtedness of students who have obtained Direct Subsidized or Direct Unsubsidized Loans for attendance at the school or in the borrower's program of study)?	_____	yes___no___
685.304(b)(2)(ii)	b. Repayment options (standard repayment, extended repayment, graduated repayment, income contingent repayment, and loan consolidation)?	_____	yes___no___
685.304(b)(2)(vi)	c. Deferment and cancellation options?	_____	yes___no___
685.304(b)(2)(iii)	d. Debt management strategies?	_____	yes___no___
685.304(b)(2)(v)	e. The seriousness and importance of the repayment obligation?	_____	yes___no___
685.304(b)(2)(v)	f. The likely consequences in forceful terms of default, including adverse credit reports, garnishment of wages, and litigation?	_____	yes___no___
685.304(b)(2)(iv)	g. An explanation of how to contact the party servicing the student's Direct Loan?	_____	yes___no___
685.304(b)(2)(vii)	4. At exit counseling, does the institution 174	_____	yes___no___

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Reference	Question	Responsible Office	Response
	require the borrower to provide or correct his/her name, address, Social Security Number, driver's license number, references, and name and address of the borrower's expected employer?		
685.304(b)(2)(vii)	a. Does the institution report this data to the Direct Loan Servicer within 60 days?	_____	yes___no___
685.304(b)(4)	5. Does the institution maintain documentation in the student's file substantjating that the exit counseling has been performed?	_____	yes___no___
685.309(b)(1)	SS. Does the institution complete and return Student Status Confirmation Reports (SSCRs) to the National Student Loan Data System (NSLDS) within 30 days of receipt?	_____	yes___no___
685.309(b)(2)	1. If the institution does not expect to submit an SSCR within 60 days of learning that a student's enrollment status has changed, and that change would normally be reported on the SSCR, does the institution notify NSLDS *within 30 days*?	_____	yes___no___
	TT. Does the institution maintain records (including in microfilm or other media formats, if desired) for all loans received by or on behalf if its students, in addition to a copy of the loan application, of the following:	_____	yes___no___
685.309(c) 668.24(c)	1. Loan amount and enrollment period for which the loan was intended?	_____	yes___no___
	2. Documentation of the student or parent borrower's eligibility for Direct Loan funds?	_____	yes___no___
	3. The calculation used to determine loan eligibility?	_____	yes___no___
	4. Date of disbursement of the loan proceeds by the school to the student or parent borrower?	_____	yes___no___
	5. Documentation of and information collected at any initial or exit loan counseling?	_____	yes___no___
	6. The amount, date, and basis of the	_____	yes___no___

Reference	Question	Responsible Office	Response
	calculation of any refund or overpayment paid to or on behalf of a student?		
	7. Any other record required for the school to document its compliance with applicable requirements with respect to the loan?	_____	yes___no___
668.24(e)(2)(ii)	UU. Unless questioned by an audit program review, investigation, or other review, does the institution maintain records and copies of reports for three years from the end of the award year in which the records are submitted ?	_____	yes___no___
668.24(e)(2)(i)	VV. Unless questioned by an audit, program review, investigation, or other review, does the institution maintain records relating to a student or parent borrower's eligibility and participation in the Direct Loan Program for three years after the end of the award year in which the student last attended the institution?	_____	yes___no___
668.24(e)(3)	WW. Does the institution keep all records involved in any loan, claim, or expenditure questioned by a Title IV audit, program review, investigation, or other review until the later of: ▸ the resolution of the questioned loan, claim or expenditure; or ▸ the end of the retention period applicable to the record?	_____	yes___no___

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Other Recommended Good Practices for the Administration of the Direct Loan Program

Practice	Comments
1. The institution should be familiar with the rights and responsibilities of the borrower [Section 685.206], and should include this information in its loan counseling.	
2. The institution should ensure that the student has explored all other sources of aid, and should caution the student to borrow the minimum amount needed.	
3. Students should be encouraged to consider what the amount of their monthly repayments will be, as well as what their income is likely to be.	
4. The institution should emphasize the importance of maintaining complete, accurate, and up to date information about their loans.	
5. Institutions that are lenders should attempt to meet with the borrower to ensure that he/she understands his/her rights and obligations before making an initial disbursement.	

Comments on the Administration of the Direct Loan Program_____

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IX. Health Professions Student Loans (HPSL)

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
	A. Does the institution have a copy of the Student Financial Aid Guidelines and copies of HHS Policy Memoranda to be used in fulfilling compliance requirements?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 303.5.5	B. Do both the financial aid administrator and the fiscal officer have a copy of the current application for funds; the current Notice of Award; the most recent Annual Operating Report; other required reports?	_____ _____	yes___no___
57.203	C. Does the institution complete the application for Federal capital contribution if the Secretary requests it?	_____	yes___no___
57.205(a)	D. Are the Federal capital contributions received by the institution, if any, identified in a special account at the school?	_____	yes___no___
	1. Is the account used by the school only for:	_____	yes___no___
	▸ Health Professions Student Loans (HPSLs) and Primary Care Loans (PCLs) to full-time students;		
	▸ capital distribution as provided in Section 743 of the Act or as agreed to by the school and the Secretary;		
	▸ costs of litigation; and		
	▸ to the extent specifically approved by the Secretary, other collection costs that exceed the usual expenses incurred in the collection of HPSLs and PCLs?		
	2. Does the account contain monies representing the Institutional Capital Contribution (ICC) at all times?	_____	yes___no___
	3. Are the account funds maintained in an interest bearing account or investment instrument that meets OMB requirements?	_____	yes___no___
	4. Does the school review the fund at least semi-annually to determine if the fund balance with projected levels of expenditures and collections exceeds its	_____	yes___no___

Reference	Question	Responsible Office	Response
	needs?		
	a. If monies in excess are identified, are they reported and the federal share returned to the federal government?	_____	yes___no___
57.206(a),(b)	E. Does the institution determine eligibility of the student borrower for a HPSL according to the following regulatory and statutory requirements:		
	1. Degree and Discipline: Is HPSL awarded only to full-time students working toward degrees in allopathic medicine; osteopathic medicine; dentistry; podiatric medicine; optometry; veterinary medicine; and bachelor's or doctoral degrees in pharmacy?	_____	yes___no___
	a. Are allopathic and osteopathic medical students only considered eligible for HPSL if they first obtained HPSL funds prior to July 1, 1993? *NOTE: Allopathic and osteopathic medical students who had not borrowed under HPSL as of 7/1/93 may not borrow HPSL; however, they may be considered for a Primary Care Loan.*	_____	yes___no___
Student Financial Aid Guidelines, Sec. 103.3.14	2. Financial Need: Is HPSL eligibility limited to students demonstrating financial need?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 103.3.141	a. Is financial need determined by a Department of Education federal need analysis methodology using, regardless of the tax status of the student, the expected contribution from parents, spouse, self, or other family members?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 103.3.142	b. Is an expected contribution from parents considered when determining financial need for ***all*** students, regardless of the age, marital status, or tax filing status of the student, unless the parents are deceased?	_____	yes___no___
Campus-based Policy Memorandum, 96-1	c. Does the aid administrator document professional judgment adjustments of a student's family contribution to more	_____	yes___no___

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Reference	Question	Responsible Office	Response
	realistically reflect the family's ability to meet educational costs?		
57.206(a)(1)(i)	3. Citizenship: Does the institution ensure that all recipients are citizens or nationals of the United States, or are permanent residents of U.S., Republic of Palau, Republic of the Marshall Islands, the Federated States of Micronesia, the Commonwealth of Northern Marianas, American Samoa, or are lawful permanent residents of Puerto Rico or Guam?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 303.5.5	a. If the borrower is not a U.S. citizen, is permanent residency documented with an original I-551 or I-151 card? (The Department of Education database match with INS is not acceptable documentation for HHS funds.)	_____	yes___no___
	4. Academic Standing: Are all recipients capable of maintaining good academic standing in the program?	_____	yes___no___
57.206(a)(1)(v)	5. Selective Service: If required to do so, are all applicants registered for Selective Service?	_____	yes___no___
	6. Financial Aid Transcript: Have all recipients submitted a financial aid transcript from other previously attended institutions?	_____	yes___no___
Campus-based Policy Memorandum, 96-1	*NOTE: Beginning with award year 1996-97, schools have three options for complying with this requirement. Schools may: query the NSLDS only; collect a paper financial aid transcript only; or, query the NSLDS to obtain Department of Education data, and request a paper financial aid transcript to obtain information on HHS programs.*		
57.206(b)(2)	F. When awarding HPSL, are costs reasonably necessary for the student's attendance at the school considered, including any special needs and obligations directly affecting the student's ability to attend the school on a full-time basis?	_____	yes___no___

Reference	Question	Responsible Office	Response
57.207	G. Have maximum loan limits been observed? That is, $2500 plus the cost of tuition for a 9-month school year? (Note: for 12-month enrollment, amount may be proportionately increased.)	_____	yes___no___
57.206(b)(2)	H. Are the criteria for determining these costs documented?	_____	yes___no___
	1. If unusual circumstances warrant an adjustment to a student's cost of attendance, are these adjustments documented?	_____	yes___no___
PL 103-433 Sec. 722(a), Campus-based Policy Memorandum, 96-1	2. Is the institution aware that HPSL awards to 3rd and 4th year medical and osteopathic medical students may be increased to pay balances of student loans for attendance at the school through programs other than HPSL, LDS, or PCL?	_____	yes___no___
	a. If the school increases an HPSL, PCL, or LDS award to pay a student's loan balances, does the check include as a payee the lender or holder of the loan(s) being repaid?	_____	yes___no___
	i. Is there a clear audit trail showing that the funds are disbursed on behalf of the student to repay educational loans and that the loan must be repaid by the student under the terms of the promissory note?	_____	yes___no___
57.208(c)(1)	I. At the time the loan is made, does the institution disclose to the borrower all information required by Sec. 57.208(c)(1)?	_____	yes___no___
57.208(c)(3)	J. Does the institution comply with Truth-in-Lending Regulation Z (12 CFR Part 226)?	_____	yes___no___
57.208(c)(2)	K. Prior to the borrower completing or terminating studies at the school, does the institution disclose to the borrower the following information:	_____	yes___no___
	▸ the amount of each HPSL borrowed by the student;		
	▸ the total amount of HPSL borrowed by the student; and		

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Reference	Question	Responsible Office	Response
	▸ a repayment schedule including the number, amount, and frequency of payments to be made?		
57.208(a) *Student Financial Aid Guidelines*, Sec. 101.3.51	L. Is each student borrower required to sign a promissory note prior to the disbursement of funds?	_____	yes___no___
57.216(a)	M. Does the institution consider delinquent all accounts overdue by more than 120 days?	_____	yes___no___
57.208	N. Does the institution use a promissory note that is approved by the Secretary and contains the applicable interest rate, and a provision of acceleration clause?	_____	yes___no___
57.208(a)(3),(c)(3)	1. Is a copy of the note and the Truth-in-Lending documents supplied by the school to the borrower?	_____	yes___no___
57.208(c)(3) 12 CFR 226.17, 18	2. Is the institution using the Truth-in-Lending disclosure forms required by 12 CFR 226.17 and .18?	_____	yes___no___
57.208(b)	O. Does the school require security or endorsement only if the borrower is a minor and a note signed by him/her would not create a binding obligation under applicable state law?	_____	yes___no___
57.208(a)	P. Are promissory notes properly safeguarded against fire, theft, and tampering?	_____	yes___no___
57.210(a)	Q. Is the institution in compliance with repayment and collection of HPSL requirements including at least a quarterly repayment schedule (or monthly payment schedule for borrowers who are more than 60 days delinquent)?	_____	yes___no___
	R. In exercising due diligence in HPSL collections, does the institution:		
57.210(b)(1)	1. Follow procedures that are at least as extensive as those used in the collection of other student loans at the school?	_____	yes___no___
57.210(b)(1)(i)	2. Conduct and document an entrance interview (individually or in groups) with the borrower prior to disbursing funds in the	_____	yes___no___

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Reference	Question	Responsible Office	Response
	academic year?		
57.210(b)(1)(i)	a. During the entrance interview, does the school obtain documentation indicating that the student is aware of his/her rights and responsibilities, and collect personal information that could be used in locating the borrower should the borrower fail to notify the school of address changes?	_____	yes___no___
	3. Conduct and document an exit interview (individually or in groups) with the borrower prior to the termination of the borrower's studies?	_____	yes___no___
57.210(b)(1)(ii)	a. During the exit interview, is each borrower provided with information necessary to carry out terms of repayment; reminded of rights and responsibilities; and required to update personal information to be used in locating the borrower?	_____	yes___no___
57.208(c)(2)	b. When providing the borrower with repayment information, does the school inform the borrower of the amount of each individual loan borrowed, the total amount borrowed, and the repayment schedule?	_____	yes___no___
57.210(b)(1)(ii)	c. If the borrower terminates his/her studies without advance notice, does the school document attempts to provide borrower with exit interview information and to secure updated information by mail?	_____	yes___no___
57.210(b)(1)(iii), (iv)	4. At least twice during the grace period, and one to three months prior to the expiration of a deferment period, notify the borrower of the impending repayment obligation?	_____	yes___no___
57.210(b)(1)(v)	5. Perform regular billing?	_____	yes___no___
57.210(b)(1)(vi)	6. Document four attempts to contact the borrower when payments are past due, if the school has the student's current address? (These attempts must be at not more than	_____	yes___no___

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Reference	Question	Responsible Office	Response
	30-day intervals prior to the loan becoming 120 days past due. At least three attempts must be made in writing.)		
57.210(b)(1)	7. Use collection practices generally accepted among institutions of higher education and that are at least as extensive and effective as those used in the collection of other student loan accounts due the school?	_____	yes___no___
57.210(b)(1) (i),(ii)	S. Does the institution conduct and document appropriate entrance and exit interviews with each borrower?	_____	yes___no___
57.215(a)	T. Does the institution submit the Annual Operating Report and Debt Management Report to the Secretary each year within 45 days of the close of the reporting period and retain a copy of these reports for five years?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 303.1.3	U. Does the institution submit a Financial Status Report at the end of the fiscal year in which funds were awarded?	_____	yes___no___
57.215(b),(c)	V. Does the institution retain complete student records for five years after full-time enrollment ceases, and retain repayment records for five years after the date of retirement of the loan? (Unlike the Department of Education, the Department of Health and Human Services, 5-year record retention requirement has NOT changed to three years.)	_____	yes___no___
	1. In cases where questions have arisen as a result of a Federal audit, does the institution retain affected records until resolution of all audit questions?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 304.1.1 57.215(a)(3)	W. Are procedures and records established to provide for a detailed biennial audit as required under Section 705 of the Public Health Service Act?	_____	yes___no___
57.216(a)	X. Has the institution developed strengthened recordkeeping and collections procedures to comply with the performance standards for the HPSL program? (Specifically, performance standards relating to the maximum default rate allowed?)	_____	yes___no___

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Reference	Question	Responsible Office	Response
57.206(d)	Y. Does the institution have procedures in place to verify the accuracy of the data on the student's federal need analysis output document?	_____	yes__no__
57.210(b)(2)	Z. Does the institution assess a late charge (not to exceed 6% of the amount due) if a borrower fails to pay all or any part of an installment when the loan is more than 60 days past due and, in the case of a borrower entitled to deferment, for any failure to file satisfactory evidence of entitlement to deferment within 60 days of the due date?	_____	yes___no___

Comments on the Administration of the Health Professions Student Loan Program _____

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X. Primary Care Loans (PCL)

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
	A. Does the institution have a copy of the Student Financial Aid Guidelines and copies of HHS Policy Memoranda to be used in fulfilling compliance requirements?	_____	yes___no___
PHS Act, Sec. 723(b)(1)	B. In managing and administering the PCL program, does the institution comply with all regulatory and statutory requirements established for the Health Professions Student Loan (HPSL) program?	_____	yes___no___
	C. In addition to the eligibility criteria established for HPSL, does the institution also ensure that all PCL recipients:		
PHS Act, Sec. 723(a)	1. Are enrolled full-time at a public or non-profit institution in a program leading to a degree in allopathic medicine or osteopathic medicine?	_____	yes___no___
PHS Act, Sec. 723(a)(2)(A)(i)	2. Have not received a HPSL loan prior to July 1, 1993?	_____	yes___no___
PHS Act, Sec. 723(a)(1)(A)	3. Have agreed to enter and complete a residency training program in primary health care not later than four years after the date on which the borrower graduates from the institution and practice primary health care through the date on which the loan is repaid in full?	_____	yes___no___
Federal Register, Notice, February 26, 1993; PHS Act, Sec. 723(a)	D. Does the process for selecting PCL recipients include: ▸ a committee that has representation from each of the primary health care disciplines; and ▸ a system to fully educate students about each of primary care career and to evaluate candidates in relation to their commitment to generalist and preventive medicine practice and other pertinent factors?	_____	yes___ no___
Campus-based Policy Memorandum, 96-1	E. Has the school identified (an) official(s) who can respond to student questions about the PCL program?	_____	yes___no___

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Reference	Question	Responsible Office	Response
	F. Has the school identified procedures it will use for certifying compliance with the service obligation and assuring that each recipient understands the responsibility to comply with the procedures?	_____	yes___no___
	G. Has the school established internal procedures for dealing with recipients who fail to comply with the service agreement?	_____	yes___no___
Campus-based Policy Memorandum, 96-1	H. In addition to the award letter, are recipients required to sign a PCL promissory note obligating the recipient to serve as a primary care health provider?	_____	yes___no___
	1. Does the school maintain the original promissory in their files?	_____	yes___no___
	2. Does the school monitor compliance with the primary care health provider requirement?	_____	yes___no___
Campus-based Policy Memorandum, 96-1	I. After the borrower completes medical school does the school require the borrower to submit self-certification of compliance with the service obligation?	_____	yes___no___
	1. At minimum, does the self-certification include a statement that the recipient is practicing primary care in accordance with the terms of the PCL promissory note, and is the statement signed and dated by the borrower?	_____	yes___no___
Campus-based Policy Memorandum, 96-1	J. Does the institution consider the student "in default" of the primary care service obligation at the time that the student: ▸ enters subspecialty training; ▸ fails to be able to complete a primary care residency within 4 years of graduation; ▸ fails to practice primary care; or ▸ fails to document residency status or primary care practice within 120 days of the original due date?	_____	yes___no___

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Campus-based Policy Memorandum, 96-1	K. If PCL and HPSL funds are maintained together in the same account, does the school have a separate recordkeeping procedure for PCL, including a separate general ledger account?	_____	yes___no___
Campus-based Policy Memorandum, 96-1 PHS Act, Sec. 723(b)(6)	L. Beginning with the June 30, 1996 report, does the institution submit the Annual Operating Report to the Secretary, including information on the number of students who graduated three years prior; and the number of those graduates who were in primary care residency or practice during the their third post-graduate year?	_____	yes___no___

Comments on the Administration of the Primary Care Loans Program_____

XI. Loans for Disadvantaged Students (LDS)

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
	A. Does the Institution have a copy of the Student Financial Aid Guidelines and copies of HHS Policy Memoranda to be used in fulfilling compliance requirements?	_____	yes___no___
Federal Register Notice, 10/1/91	B. In managing and administering the LDS program, does the institution comply with all regulatory and statutory requirements established for the Health Professions Student Loan program?	_____	yes___no___
PHS Act, Sec. 724(b)(1), (c)	C. In addition to meeting the eligibility requirements established for the HPSL program, does the institution only consider students from disadvantaged backgrounds as defined by the Secretary of Health and Human Services when awarding LDS?	_____	yes___no___
PHS Act, Sec. 724(b)(1)	D. Does the institution carry out recruitment and retention programs for students from disadvantaged backgrounds, including ethnic and racial minorities?	_____	yes___no___
PHS Act, Sec. 724(b)(2)	E. Does the institution have a program for recruiting and retaining minority faculty?	_____	yes___no___
PHS Act, Sec. 724(c)(1)	F. Does the institution's curricula include adequate instruction in minority health issues, specifically, course work reflecting an awareness of the special needs of minority health populations?	_____	yes___no___
PHS Act, Sec. 724(c)(2)	G. Does the institution have an arrangement with one or more health clinics that provide services to a significant number of individuals from minority groups, so that students can gain experience providing clinical services to individuals from disadvantaged backgrounds?	_____	yes___no___
PHS Act, Sec. 724(c)(3)	H. Does the institution have an arrangement with one or more public or non-profit private secondary schools and undergraduate institutions of higher education to provide academic preparation to disadvantaged students, including minority students, for entry into health professions programs, and to recruit students into these programs?	_____	yes___no___

LDS PROGRAM

Reference	Question	Responsible Office	Response
PHS Act, Sec. 724(c)(4)	I. Does the institution have a mentoring program to assist disadvantaged students, including minority students, in completing the requirements necessary to earn a health professions degree?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 102.2.221	J. If interested in receiving FCC for the LDS program, does the institution annually submit an application requesting these funds?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 102.2.223	K. Has the institution designated individuals who are responsible for administering the LDS program?	_____	yes___no___
Federal Register Notice, 10/1/91	L. As loans made from the LDS fund are repaid, is the money returned to the fund and used solely for support of students from disadvantaged backgrounds through the LDS program?	_____	yes___no___
Federal Register Notice, 10/1/91	M. Does the institution maintain separate accountability for LDS funds?	_____	yes___no___

Comments on the Administration of Loans for Disadvantaged Students _____

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XII. Health Education Assistance Loan Program (HEAL)

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
60.50(a)	A. Has the institution signed a written HEAL participation agreement and an insurance contract with the Secretary of the Department of Health and Human Services?	_____	yes___no___
60.5	B. Does the institution determine student eligibility for HEAL funds according to the following regulatory requirements:		
Policy Memoranda, S-96-1, S-96-4, S-96-7	1. Continuing Borrowers: Does the school approve HEAL funds only for applicants who had previously borrowed Federal HEAL funds prior to October 1, 1995?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 104.3.11	2. Citizenship Status: Does the school approve HEAL funds only for citizens or nationals of the United States, and lawful permanent residents of the United States, Commonwealth of Puerto Rico, Guam, American Samoa, the Virgin Islands, Palau, or the Northern Mariana Islands?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 104.2.332	a. Are eligible noncitizens asked to submit original documentation of citizenship status to the institution, and is a copy of that documentation sent to the HEAL lender along with the student's initial HEAL application?	_____	yes___no___
60.51 *Student Financial Aid Guidelines*, Sec. 104.2.332	i. Does the institution accept only an original I-551 or I-151 card as documentation of eligible noncitizen status? (The Department of Education database match with INS is not acceptable documentation for HEAL purposes.)	_____	yes___no___
Policy Memorandum, S-95-13	ii. Is the institution aware that a student is ineligible for HEAL if the I-551 or I-151 card shows Class Code "CR?" *(Exception: Effective June 22, 1995, despite a CR Class Code, a noncitizen is eligible if he or she presents the following:*	_____	yes___no___

Reference	Question	Responsible Office	Response
	▸ *a Notice of Removal of Conditional Basis of Lawful Permanent Residence from INS; and* ▸ *a document stamped with the words "Processed for I-551. Temporary Evidence of Lawful Admission for Permanent Residence" along with a handwritten adjustment status and initials of an INS official. When the new I-551 is received, it should be shown to the aid administrator, who must send a copy to the lender.)*		
60.5; *Student Financial Aid Guidelines*, Sec. 104.3.12	3. Academic Status: Is the student enrolled or accepted for enrollment as a full-time student in a participating institution? If the student is enrolled, is he/she in good academic standing?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 104.3.13	4. Enrollment Status: Is the student enrolled in one of the following programs: doctor of allopathic medicine, osteopathic medicine, dentistry, veterinary medicine, optometry, podiatric medicine, or chiropractic; bachelor's or master's in pharmacy; master's or doctoral degree in health administration; graduate or equivalent degree in public health; or doctoral degree in psychology?	_____	yes___no___
60.5 *Student Financial Aid Guidelines*, Sec. 104.3.131	a. For pharmacy students, does the institution certify a HEAL loan only after the student has satisfactorily completed three years of training toward a pharmacy degree?	_____	yes___no___ n/a___
60.5 *Student Financial Aid Guidelines*, Sec. 104.3.132	b. For condensed programs combining an undergraduate program with a medical, osteopathic medical, or dentistry program, does the institution only approve HEAL for the last four years of the student's program?	_____	yes___no___ n/a___
Student Financial Aid Guidelines,	c. For multiple degree allopathic medical programs (such as an MD/Ph.D.,	_____	yes___no___

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Reference	Question	Responsible Office	Response
Sec. 104.3.133	MD/JD, MD/MPH) are students in the program approved for HEAL only when they are pursuing the MD portion of the program as full-time students?		
Student Financial Aid Guidelines, Sec. 104.3.15	5. Selective Service: Are all students registered for the Selective Service, if required under the Military Selective Service Act?	_____	yes___no___
60.5, 60.51	6. Financial Need: Does the institution insure that borrowers do not exceed the lesser of their financial need or the legal maximum loan limit under the program?	_____	yes___no___
60.10	a. Is HEAL eligibility based on standard costs of attendance for a period not to exceed one academic year?	_____	yes___no___
60.51(f)(2)	i. Does the institution maintain a general record of the criteria used to develop standard student budgets?	_____	yes___no___
60.51	ii. Does the institution use the same budgets to award HEAL funds as it does for other programs (such as Title IV funds?)	_____	yes___no___
60.51	iii. If HEAL origination fees are incorporated into the student's budget, does the amount only include fees for which the student is responsible? (The amount that the institution must pay, if any, should not be included.)	_____	yes___no___ n/a___
60.51	iv. When an aid administrator makes adjustments to the standard student budget to reflect individual circumstances, is justification for the adjustments described in writing, along with at least one applicable outside document which is signed and dated by the aid administrator?	_____	yes___no___
60.51	b. In determining financial need, is a family contribution obtained from an	_____	yes___no___

Reference	Question	Responsible Office	Response
	approved need analysis system, and are any adjustments that are made to the need analysis documented in the student's record?		
60.51(f)(1) 60.56(a)(4) *Student Financial Aid Guidelines*, Sec. 104.2.361	c. In determining financial need, does the institution consider other student resources and other financial aid awarded to the student, and maintain that data in the student's record?	_____	yes___no___
60.51(f) *Student Financial Aid Guidelines*, Sec. 104.3.2	d. Does HEAL loan eligibility only reflect expenses directly related to the borrower's education, not to exceed annual/aggregate loan limits as follows:		
	i. Medicine, osteopathic medicine, dentistry, veterinary medicine: optometry, or podiatric medicine, a maximum of $20,000 in any academic year and up to $80,000 aggregate?	_____	yes___no___
	ii. Public health, pharmacy, chiropractic, or a graduate program in health administration, clinical psychology, or allied health: a maximum of $12,500 per academic year, up to $50,000 aggregate?	_____	yes___no___
PL 102-408 Sec. 705(a)(1)(A)	7. Educational Purpose: Has the student agreed to use HEAL funds solely for tuition, fees, books, lab expenses, and reasonable living expenses?	_____	yes___no___
60.33	8. Default Status: Is the institution aware that borrowers who are in default or delinquent on federal obligations are considered ineligible for HEAL? (The borrower may be considered eligible if the lender is given documentation from the affected federal agency certifying that satisfactory repayment arrangements have been made.)	_____	yes___no___
60.51(d) 60.56(a)(14) 60.33(c)	a. Is a financial aid transcript on file from each institution a student attended at least half-time, and is the transcript reviewed to confirm that the student is not in default and does not owe a	_____	yes___no___

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Reference	Question	Responsible Office	Response
	repayment of federal financial aid?		
Campus-based Policy Memorandum, 96-1	*NOTE: Beginning with award year 1996-97, schools have three options for complying with this requirement. Schools may: query the NSLDS only, collect a paper financial aid transcript only, or query the NSLDS to obtain Department of Education data, and request a paper financial aid transcript to obtain information on HHS programs.*		
60.33	9. Creditworthiness: Is the institution aware that lenders will deny HEAL to a borrower who does not have a good credit record? (The absence of a credit history is considered good credit.)	_____	yes___no___
60.51(b) 60.61(a)(3) *Student Financial Aid Guidelines*, Sec. 104.2.33, 104.2.31	C. Does the institution verify the accuracy and completeness of the information provided on the student's HEAL application?	_____	yes___no___
	1. If the institution cannot resolve potential discrepancies found in the verification process, does the institution notify the potential lender of these discrepancies?	_____	yes___no___
60.61(a)(4)	D. Are documented procedures in place which keep check receipt and release functions separate from application and approval functions?	_____	yes___no___
60.52	E. Once the institution receives the check, does it adhere to prescribed procedures for handling HEAL checks as follows:		
60.52(a)(2)	1. If the check is received prior to the student's enrollment does the institution forward the check to the student to endorse and return to the institution?	_____	yes___no___
	a. Once the check is endorsed by the student, does the school retain the funds due to the institution, and hold the remaining funds for disbursement to the student until he or she is enrolled, unless the student is unable to meet other educational expenses due before time of enrollment?	_____	yes___no___

Reference	Question	Responsible Office	Response
60.52(a)(1)	2. If the check is received after the student is enrolled, does the institution obtain the student's endorsement, retain the portion of the funds due the institution, and disburse the remaining funds to the student?	_____	yes___no___
60.52(b)	a. If the check is received after the institution determines that the student does not plan to enroll, does the school return the check to the lender within 30 days of this determination?	_____	yes___no___
60.56(d)	F. Does the institution maintain written procedures for the receipt, verification of amount, and disbursement of HEAL checks or drafts?	_____	yes___no___
Policy Memorandum, S-95-03	G. If the institution receives HEAL funds from the lender via Electronic Funds Transfer (EFT), does the institution:		
	1. Have a written contract with the lender, executed before the commencement of EFT, stating that each party will comply with all provisions in Policy Memorandum S-95-03, as well as applicable HHS requirements?	_____	yes___no___ n/a___
	a. Is a copy of Policy Memorandum S-95-03 attached to the contract?	_____	yes___no___ n/a___
	2. Have a restricted account designated for receipt of student loan proceeds, and maintained in accordance with Policy Memorandum S-95-03?	_____	yes___no___ n/a___
	3. Obtain, from each borrower, written authorization for the release of funds via EFT?	_____	yes___no___ n/a___
60.56	4. Maintain, for at least five years after the borrower's last date of attendance, disbursement information in accordance with 42 CFR Part 60.56, including evidence that funds were transferred and disbursed?	_____	yes___no___ n/a___
Policy Memorandum, S-95-03	5. Employ adequate reporting procedures to meet requirements outlined in Policy Memorandum S-95-03?	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
Student Financial Aid Guidelines, Sec. 104.2.45	H. Does the institution request HEAL disbursements in amounts that correspond to the borrower's educational expenses for the period in which the disbursement is made?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 104.2.47	I. If the borrower's need decreases before the second disbursement is made, does the institution notify the lender, in writing, of the amount of the decrease?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 104.2.47	J. If, before the second disbursement of HEAL funds has been made, the institution determines that the borrower's need has decreased, is the check returned to the lender so that a new check can be issued? (To *increase* a borrower's HEAL after it is approved, the borrower must submit a new application for the additional amount.)	_____	yes___no___
Student Financial Aid Guidelines, Sec. 104.2.3635	K. Does the institution determine and document that HEAL loans disbursed within 60 days *of graduation* are only made on unpaid costs or expenses that have been covered by short-term financing arrangements which must be repaid?	_____	yes___no___
	1. Is the institution aware that HEAL may not be used to pay graduation costs, such as moving to a residency site or setting up a practice?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 104.2.3634	L. Does the institution determine and document that HEAL loans disbursed within 60 days of the *end of the academic year* are only for academic year costs that have not been paid at the time of application?	_____	yes___no___
	1. Is the institution aware that HEAL cannot be borrowed to cover cash advances from credit cards to pay educational expenses?	_____	yes___no___
60.53	M. Within 30 days of a student's change in enrollment status, does the institution notify the holder of a student's HEAL loan (or the HEAL Program Office if the identity of the current holder of the loan is unknown) of the change?	_____	yes___no___
60.53	1. Does the notification contain the student's latest known permanent and temporary addresses, the student's full name, Social Security Number, and date of status change?	_____	yes___no___

Reference	Question	Responsible Office	Response
60.53	2. If the holder of the loan is unknown, does the institution notify the HEAL Program Office of the change in enrollment status?	_____	yes___no___
60.55	N. Does the institution have administrative and fiscal procedures ensuring:		
	1. Proper, efficient administration of funds received from students with HEAL loans?	_____	yes___no___
	2. Protection of the rights of students under the HEAL program?	_____	yes___no___
	3. Protection of the U.S. Government from unreasonable risk of loss due to defaults?	_____	yes___no___
	4. Compliance with all HEAL program requirements?	_____	yes___no___
60.54	O. If the borrower withdraws, is dismissed, or takes a leave of absence, does the institution have procedures to pay that portion of a refund that is allocable to a HEAL loan directly to the original lender (or to a subsequent holder of the loan note, if the institution has knowledge of the holder's identity) and simultaneously provide written notice to the borrower?	_____	yes___no___ n/a___
	1. Are canceled HEAL funds returned to the lender within 120 days of disbursement, indicating "returned after disbursement?"	_____	yes___no___ n/a___
	2. If HEAL funds are not disbursed to the borrower, are the funds returned to the lender within 60 days of the disbursement date, indicating "returned prior to disbursement?"	_____	yes___no___ n/a___
	3. When returning loan proceeds to the lender, does the institution provide the following information with each return: borrower name, Social Security Number, reason for return, and amount and date funds were returned to lender?	_____	yes___no___
60.57	P. Does the institution submit reports to the Secretary within the time requirements specified in 60.57, and is a copy of each report retained for not less than five years following completion?	_____	yes___no___

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Reference	Question	Responsible Office	Response
Policy Memorandum, S-95-6 *Student Financial Aid Guidelines*, Sec. 104.2.43	Q. At the beginning of each academic year, does the institution conduct an annual workshop concerning the HEAL Loan, in accordance with requirements specified in Policy Memorandum S-95-6?	_____	yes___no___
	1. Are all HEAL borrowers required to attend the workshop, or, if it is impossible for a borrower to attend (e.g., due to rotation schedules), does the institution mail the materials to the borrower?	_____	yes___no___
	2. If the school's HEAL default rate exceeds 5%, does the school:		
	a. use the *Debt Management Workbook* or a similar financial planning document as the basis for the workshop?	_____	yes___no___
	b. include in any default management plan submitted during or after the award year a detailed outline of the annual HEAL workshop, including format, content, and resources used?	_____	yes___no___
60.61(a)(1) 60.56(a) *Student Financial Aid Guidelines*, Sec. 104.2.42	R. Does the institution conduct and document an entrance interview with each borrower, individually or in groups, prior to the first HEAL disbursement of the academic year? (At the school's option, the entrance interview may be conducted as part of, or in conjunction with, the annual workshop, or may be given separately.)	_____	yes___no___
	1. During the entrance interview, is the borrower informed of his or her rights and responsibilities, including consequences for noncompliance with responsibilities?	_____	yes___no___
	2. Does the institution collect personal information during the entrance interview that would assist in locating the borrower if the borrower leaves the institution without an exit interview?	_____	yes___no___
	3. If a face-to-face entrance interview is impractical, does the institution meet the entrance interview requirement through correspondence?	_____	yes___no___

Reference	Question	Responsible Office	Response
	4. In cases where the entrance interview is met through correspondence, does the institution require that the completed entrance interview materials be returned prior to disbursing the HEAL check?	_____	yes___no___
60.61(a)(2) 60.56(a) *Student Financial Aid Guidelines*, Sec. 104.4.2	S. Does the institution conduct and document an exit interview with each borrower, individually or in groups, within the final academic term prior to his or her anticipated graduation or other departure date from the institution?	_____	yes___no___
60.61(a)(2)	1. During the exit interview does the institution give at least the same rights and responsibilities information, and collect the same personal data, as is required for the entrance interview?	_____	yes___no___
60.61(a)(2)	2. Within 30 days of the exit interview, is a copy of the exit interview documentation, including the personal "skip-tracing" information, sent to the lender or holder of the loan?	_____	yes___no___
60.61(a)(2)	3. If a borrower leaves the institution without an exit interview, does the institution mail exit interview information within 30 days of the earlier of the institution's knowledge of the student's departure date, or the anticipated departure date, and request that required student information be forwarded by the student to the lender?	_____	yes___no___
60.56 60.42	T. For each HEAL borrower, does the institution maintain, for not less than five years (unless otherwise directed by the Secretary) after the date the student graduates, withdraws, or fails to enroll full-time, an easily retrievable record containing all of the following that apply:		
	1. The student's name and address?	_____	yes___no___
	2. The student's academic standing?	_____	yes___no___
	3. The student's period of attendance?	_____	yes___no___
	4. The name of the HEAL lender?	_____	yes___no___
	5. The amount of the HEAL loan? 200	_____	yes___no___

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Reference	Question	Responsible Office	Response
	6. The period for which the HEAL loan was intended?	_____	yes___no___
	7. The amount and source of any other financial aid received by the student for the period for which the HEAL loan was made?	_____ _____	yes___no___
	8. The date the institution received the HEAL check or draft and the date it was either given to the student or returned to the lender?	_____	yes___no___
	9. The date the institution disbursed a loan to a student (in the case of a institution that is the lender)?	_____	yes___no___
	10. The date the institution signed the loan check or draft (if the institution is a copayee)?	_____	yes___no___
	11. The amount of tuition, fees and other charges paid by the student to the institution for the academic period covered by the loan and the dates of payment?	_____	yes___no___
	12. A copy of each form used by the institution in connection with the loan?	_____	yes___no___
Policy Memorandum #3, 9/15/87	13. Photocopies of each HEAL check or a disbursement roster containing the same information that appears on the check?	_____	yes___no___
60.56(a)	14. The borrower's expected post-graduate destination?	_____	yes___no___
	15. Documentation of entrance interview including the date and signature of the borrower?	_____	yes___no___
	16. Documentation of exit interview including the date and borrower's signature, or documentation that the institution mailed exit interview materials if the student failed to report for the exit interview?	_____	yes___no___
Policy Memorandum #1, 4/9/87	17. Documentation of eligible noncitizen status, such as a photocopy of I-151 or I-551?	_____	yes___no___
60.56(a)	18. Documentation of calculations used to	_____	yes___no___

Reference	Question	Responsible Office	Response
	compare the applicant's financial resources with his or her cost of education at the institution?		
	19. The standard budget used for the student, and documentation to support any adjustments made to the budget?	_____	yes___no___
	20. Copies of borrower's financial aid transcript(s)?	_____	yes___no___
	21. Copies of all HEAL-related correspondence between the institution and the borrower or the institution and the lender?	_____	yes___no___
60.56(c) PHS Act Sec. 705	22. Documentation of compliance with the biennial audit requirement?	_____	yes___no___
	23. Procedures and records that provide for a detailed audit?	_____	yes___no___
Student Financial Aid Guidelines, Secs. 104.2.154 303.2.33	U. If the school's default rate is greater than 5%, but no more than 20%, does the school prepare and submit for approval to the Division of Student Assistance an annual default management plan?	_____	yes___no___ n/a___
Student Financial Aid Guidelines, Sec. 104.2.153	V. Is the school aware that it may pay off outstanding principal and interest owed by defaulted HEAL borrowers in order to reduce institutional default rates?	_____	yes___no___ n/a___

Comments on the Administration of the Health Education Assistance Loan Program _____

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XIII. Nursing Student Loan Program

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
	A. Does the institution have a copy of the Student Financial Aid Guidelines and copies of HHS Policy Memoranda to be used in fulfilling compliance requirements?	_____	yes___no___
57.303(a)	B. Does the institution complete the application for federal capital contribution (FCC) when required by the Secretary?	_____	yes___no___
57.305	C. Has the institution established a special account in which FCC and institutional capital contributions for the NSL program are deposited, and does the institution use these funds only for:	_____	yes___no___
	▸ funding nursing student loans to full-time and half-time students;		
	▸ capital distribution as agreed to by the school and the Secretary;		
	▸ costs of litigation;		
	▸ costs associated with membership in credit bureaus;		
	▸ other collection costs; and		
	▸ other costs that exceed usual expenses incurred in NSL collections, as approved by the Secretary?		
	1. Does the institution review the fund semi-annually to determine whether the fund balance compared with projected expenditures and collections exceeds its needs?	_____	yes___no___
	2. Are monies that are in excess reported and returned to the federal government by the due date of the report which identifies the excess?	_____	yes___no___
57.306	D. In selecting NSL recipients, does the institution ensure that applicants:		
57.306(a)(1)(ii)	1. Are enrolled or accepted for enrollment at least half-time?	_____	yes___no___

NSL Program

Reference	Question	Responsible Office	Response
57.306(a)(1)(iii) 57.306(b)(2)(i)	2. Have demonstrated financial need as determined by a national need analysis service approved by the Secretary of Education?	_____	yes___no___
57.306(a)(1)(iv)	3. Are capable of maintaining good standing?	_____	yes___no___
57.306(a)(2)	4. Have submitted a financial aid transcript (for applicants who previously attended another institution of higher education)?	_____	yes___no___
Campus-based Policy Memorandum, 96-1	*NOTE: Beginning with award year 1996-97, schools have three options for complying with this requirement. Schools may query the NSLDS only, collect a paper financial aid transcript only, or query the NSLDS to obtain Department of Education data and request a paper financial aid transcript to obtain information on HHS programs.*		
57.306(b)	E. Does the institution give priority to nursing students demonstrating exceptional financial need?	_____	yes___no___
57.306(b)	F. Are licenced practical nurses given preference for NSL funding?	_____	yes___no___
57.306(c)	G. Does the institution have procedures in place to verify the accuracy of data on the student's loan application?	_____	yes___no___
57.307	H. Are the maximum annual loan limits observed? (For a 9-month school year, the maximum limit is $2,500 per year except for the final two years, when the maximum increases to $4,000 per year. The award may be proportionately increased for 12-month enrollment.)	_____	yes___no___
57.307	I. Is the $13,000 aggregate loan limit observed?	_____	yes___no___
57.308(a)	J. Is each student borrower required to sign a promissory note before the institution makes any advance?	_____	yes___no___
57.308(a)(1),(2)	1. Does the institution use an approved promissory note which includes the applicable interest rate and provision of acceleration clause?	_____	yes___no___

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Reference	Question	Responsible Office	Response
57.308(a)(3) 12 CFR 226.17, 18	2. Is a copy of each executed note supplied by the school to the student borrower along with the Truth-in-Lending disclosure forms required by 12 C.F.R. 226.17, and 18?	_____	yes___no___
57.308(a)(3)	3. Is the signed promissory note safeguarded against theft, fire, or tampering?	_____	yes___no___
57.308(b)	4. Is security or endorsement only required if the borrower is a minor and if, under State law, the note would not create a binding obligation without security or endorsement?	_____	yes___no___
57.309(b)	K. Are disbursements made such that no installment will exceed the borrower's need for that term or installment period?	_____	yes___no___
57.309(a)	L. Does the institution ensure that no payment is made to a borrower who is enrolled less than full-time?	_____	yes___no___
57.310(b)(1)(ii)	M. Does the institution conduct and document an exit interview (individually or in groups) with every borrower, or, if the student terminates without notice, does the institution attempt to inform the borrower of the substance of the exit interview and secure exit interview information by mail?	_____	yes___no___
	N. In exercising due diligence in NSL collections, does the institution:		
57.310(b)(1)	1. Follow procedures that are generally accepted among institutions of higher education and are at least as extensive as those used in the collection of other student loans at the school?	_____	yes___no___
57.310(b)(1)(i)	2. Conduct and document an entrance interview (individually or in groups) with the borrower prior to disbursing funds in the academic year?	_____	yes___no___
57.310(b)(1)(ii)	3. Conduct and document an exit interview (individually or in groups) with each borrower prior to the termination of the borrower's studies?	_____	yes___no___

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Reference	Question	Responsible Office	Response
57.310(b)(1)(ii)	a. During the exit interview, is each borrower provided with information necessary to carry out the terms of repayment, reminded of rights and responsibilities, and required to update personal information to be used in locating the borrower?	_____	yes___no___
57.310(b)(1)(ii)	b. If the borrower terminates his/her studies without advance notice, does the school document attempts to provide the borrower with exit interview content and to secure updated information by mail?	_____	yes___no___
57.310(b)(1)(iii), (iv)	4. At least twice during the grace period, and one to three months prior to the expiration of a deferment period, notify the borrower of the impending repayment obligation?	_____	yes___no___
57.310(b)(1)(v)	5. Perform regular billing?	_____	yes___no___
57.310(b)(1)(vi)	6. Make four documented attempts to contact the borrower when payments are past due if the school has the borrower's current address?	_____	yes___no___
	a. Are these attempts made at not more than 30 day intervals prior to the loan becoming 120 days past due?	_____	yes___no___
	b. Are at least three of these attempts made in writing?	_____	yes___no___
57.310(a)	O. Is the institution in compliance with the requirements for repayment and collection of NSLs including at least a quarterly repayment schedule (except when borrowers are delinquent more than 60 days, in which case a monthly payment schedule is required)?	_____	yes___no___
57.316(a)	P. Does the institution consider in default all accounts overdue by more than 120 days?	_____	yes___no___
57.316(a)	Q. Is the institution's default rate below the 5% maximum, and, if not, has the institution improved its procedures for recordkeeping and collections to comply with the performance standards for the NSL program, specifically the	_____	yes___no___

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Reference		Question	Responsible Office	Response
		maximum default rate allowed?		
57.315(a)	R.	Does the institution submit reports to the Secretary within 45 days of the close of the reporting period?	_____	yes___no___
57.315(a)(2)	S.	Does the institution retain complete student records for five years after full-time enrollment ceases and/or date of retirement of the loan?	_____	yes___no___
57.315(a)(3)	T.	Does the institution retain complete repayment records for five years after the date of the retirement of the loan?	_____	yes___no___
57.313(c)	U.	Is the determination as to whether a borrower is entitled to have any portion of his or her Nursing Student Loan canceled made by the institution upon receipt and evaluation of application for cancellation from the borrower?	_____	yes___no___
57.315(a)(1)	V.	Are required fiscal records retained by the institution until such time, as agreed upon with the Secretary, that there is no further need for retention?	_____	yes___no___
PHS Act, Sec. 705	W.	Are procedures established to provide for a detailed biennial audit, in accordance with Sec. 705 of the Public Health Service Act?	_____	yes___no___

Comments on the Administration of the Nursing Student Loan Program _____

Items marked ● applied to 1997-98 but not to subsequent years.
Items marked ◆ are effective beginning 1998-99.

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XIV. Scholarships for Disadvantaged Students (SDS)

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
	A. Does the Institution have a copy of the Student Financial Aid Guidelines and copies of HHS Policy Memoranda to be used in fulfilling compliance requirements?	_____	yes___no___
	B. Does the institution determine eligibility of the student for SDS according to the following regulatory and statutory requirements:		
Student Financial Aid Guidelines, Sec. 106.3.12	1. Degree and Discipline: Is SDS awarded only to full-time students enrolled or accepted for enrollment in the following programs: ▸ allopathic medicine; ▸ osteopathic medicine; ▸ dentistry; ▸ podiatric medicine; ▸ optometry; ▸ veterinary medicine; ▸ bachelor's or graduate degrees in pharmacy or allied health; ▸ graduate degrees in public health or clinical psychology; or ▸ associate, diploma, baccalaureate or graduate degrees in nursing?	_____	yes___no___
FR 3/21/97, p. 13657 *Student Financial Aid Guidelines,* Sec. 106.3.13, 106.2.1101	2. Disadvantaged Background: When awarding SDS, does the institution only consider students from disadvantaged backgrounds as defined by the Secretary of Health and Human Services?	_____	yes___no___
PHS Act, Sec. 737(c)(2)	3. Financial Need: Is SDS awarded only to students demonstrating financial need?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 106.3.14	a. Is financial need determined according to the Department of Education's federal need analysis methodology using, regardless of the tax status of the student, the expected contribution from parents, spouse, self, or other family members?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 106.3.13	b. Is an expected contribution from parents considered when determining financial need for all students, regardless of the	_____	yes___no___

Reference	Question	Responsible Office	Response
	age, marital status, or tax filing status of the student, unless parents are deceased?		
Student Financial Aid Guidelines, Sec. 106.3.142	c. If the financial aid administrator adjusts elements used to calculate the expected family contribution because it does not realistically reflect the family's ability to meet educational costs, is this adjustment documented by the aid administrator?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 106.3.141	d. In determining financial need, does the institution consider estimated resources and other financial aid, but exclude summer earnings, educational loans, veterans benefits, and school year earnings?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 106.3.14	4. Is preference given to students for whom the cost of attending the school would constitute a severe financial hardship?	_____	yes___no___
57.206(a)(1)(i)	5. Citizenship: Does the institution ensure that recipients are: ▸ U.S. citizens or nationals; ▸ permanent residents of the U.S., Republic of Palau, Republic of the Marshall Islands, the Federated States of Micronesia, the Commonwealth of Northern Marianas, or American Samoa; or ▸ lawful permanent residents of Puerto Rico or Guam?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 106.3.142	C. When awarding SDS, are the costs reasonably necessary for the student's attendance at the school considered, including any special needs and obligations directly affecting the student's ability to attend the school on a full-time basis?	_____	yes___no___
57.206(b)(2)	1. Are the criteria for determining these costs documented?	_____	yes___no___
Student Financial	2. If unusual circumstances warrant an	_____	yes___no___

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Reference	Question	Responsible Office	Response
Aid Guidelines, Sec. 106.3.142	adjustment to a student's cost of attendance, are these adjustments documented?		
Student Financial Aid Guidelines, Sec. 106.3.2	D. Does the institution ensure that each student's SDS award does not exceed the cost of tuition, other reasonable educational expenses and reasonable living expenses?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 106.2.1101	E. Does the institution carry out recruitment and retention programs for students from disadvantaged backgrounds, including ethnic and racial minorities?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 106.2.1102	F. Does the institution have a program for recruiting and retaining minority faculty?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 106.2.1103	G. Does the institution's curricula include adequate instruction in minority health issues, specifically course work reflecting an awareness of the special needs of minority health populations?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 106.2.1104	H. Does the institution have an arrangement with one or more health clinics that provide services to a significant number of individuals from minority groups, so that students can gain experience providing clinical services to individuals from disadvantaged backgrounds?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 106.2.1105	I. Does the institution have an arrangement with one or more public or non-profit private secondary schools and undergraduate institutions of higher education to provide academic preparation to disadvantaged students, including minority students, for entry into health professions programs, and to recruit students into these programs?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 106.2.1106	J. Does the institution have a mentoring program to assist disadvantaged students, including minority students, in completing the requirements necessary to earn a health professions degree?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 106.2.2	K. Does the institution understand that it is not required to annually submit an application requesting SDS funds if it received SDS funds in FY 96?	_____	yes___no___

SCHOLARSHIPS FOR DISADVANTAGED STUDENTS (SDS)

Reference	Question	Responsible Office	Response
Student Financial Aid Guidelines, Sec. 106.2.23	L. Has the school designated institutional officials who have responsibility for administering the SDS program, including an authorizing official, a financial aid administrator, and a fiscal officer?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 106.3.7	M. Does the institution maintain student records as needed for audit purposes? (HHS recommends that the school maintain for the SDS program the same types of information as are maintained for the HPSL and NSL programs.)	_____	yes___no___
Student Financial Aid Guidelines, Sec. 304.1.1	N. Are procedures established to provide for a detailed biennial audit, in accordance with Sec. 705 of the Public Health Service Act?	_____	yes___no___

Comments on the Administration of Scholarships for Disadvantaged Students _____

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XV. Scholarships for Students of Exceptional Financial Need (EFN) and Financial Assistance for Disadvantaged Health Professions Students (FADHPS)

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
	A. Does the institution have a copy of the Student Financial Aid Guidelines and is the financial aid and fiscal staff familiar with the program requirements outlined in that manual?	_____	yes___no___
57.1804 *Student Financial Aid Guidelines*, Sec. 105.3.14	B. For FADHPS only, does the institution consider as eligible only those students who come from disadvantaged backgrounds, as defined in Sec. 57.1804?	_____	yes___no___
57.2803(b)(1) 57.2904(b)(2) 57.2904(c)	C. To identify students who are eligible for EFN or FADHPS, does the institution rank students in order of greatest financial need?	_____	yes___no___
57.2804(c),(i) 57.2904(b)(1)(I) *Student Financial Aid Guidelines*, Sec. 105.3.131	D. Does the institution use the federal need analysis methodology approved by the Department of Education in determining financial resources of the student, parents, and, if applicable student's spouse?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 105.3.131	1. In determining available financial resources, does the institution exclude summer earnings, educational loans, veterans benefits, and school year earnings?	_____	yes___no___
57.2804(b)(3) 57.2904(b)(1)(ii)	E. Does the institution document the criteria used in developing student budgets?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 105.3.133	1. If adjustments to a student's budget are necessary, are they clearly documented?	_____	yes___no___
Campus-based Policy Memorandum, 96-1	F. Does the process for selecting EFN and FADHPS recipients include: ▸ a committee that has representation from each of the primary health care disciplines; and ▸ a system to fully educate students about each of the primary care careers and to evaluate candidates in relation to their commitment to generalist and preventive medicine practice and other pertinent factors?	_____	yes___ no___

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Reference	Question	Responsible Office	Response
57.2804 57.2904	G. Do all scholarship recipients meet the following eligibility criteria:		
	1. Are all EFN or FADHPS recipients citizens or nationals of the United States, or permanent residents of the U.S., Republic of Palau, Republic of the Marshall Islands, the Federated States of Micronesia, the Commonwealth of Northern Marianas, American Samoa, or lawful permanent residents of Puerto Rico or Guam?	_____	yes__no___
	2. Are all FADHPS recipients enrolled or accepted for enrollment full time in a program leading to a degree in medicine, osteopathic medicine, or dentistry?	_____	yes___no___
	3. Are all recipients enrolled or accepted for enrollment full-time in a program leading to a degree in medicine, osteopathic medicine, or dentistry?	_____	yes___no___
	4. Do all recipients demonstrate exceptional financial need? *NOTE: Exceptional financial need is defined as a family contribution, including parental, spousal, and student information, which does not exceed the lesser of $5,000 or 1/2 the cost of attendance.*	_____	yes___no___
57.1804 *Student Financial Aid Guidelines*, Sec. 105.3.14	5. If receiving FADHPS, does the student come from a disadvantaged background as defined by the Secretary?	_____	yes___no___
	a. Does the institution maintain documentation that indicates how recipients met the disadvantaged definition?	_____	yes___no___
57.904(b)(1)(i)	H. Does the institution obtain photocopies of parents', student's and spouse's tax returns with original signatures? *NOTE: Dept. of HHS recommends that these tax returns be used to verify information in the student's file, but it is not required.*	_____	yes___no___

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EFN AND FADHPS SCHOLARSHIPS

Reference	Question	Responsible Office	Response
PHS Act, Sec. 736(b)(2)	I. Does the institution award EFN and FADHPS in amounts that cover the cost of tuition, fees, books, supplies and laboratory expenses (but not living expenses)?	_____	yes___no___
PHS Act, Sec. 736(b)(2)	J. Does the institution award EFN and FADHPS in amounts that cover the cost of tuition, fees, books, supplies and laboratory expenses (but not living expenses)?	_____	yes___no___
	1. Is the institution aware that partial scholarships may not be made?	_____	yes___no___
Campus-based Policy Memorandum, 96-1	a. After making awards, if a partial scholarship amount remains, is the school aware that it may request additional money from HHS, or may use institutional funds to make up the difference? (Institutional funds that are used to make up the difference will become part of the debt owed to HHS in case of default.)	_____	yes___no___
	b. If a student drops out of school before using the entire scholarship, does the school either: ▸ request additional funds from HHS to make up a full award for another eligible student; or ▸ return the funds to HHS?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 105.3.4	K. Once a student is determined eligible, is an award letter sent directly to the applicant and does it contain a space for the student to accept or reject the award?	_____	yes___no___
	1. Is a duplicate copy sent to the student for the student to maintain in his/her personal records?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 105.3.4	L. In addition to the award letter, are recipients required to sign a Primary Care Contract obligating the recipient to serve as a primary care health provider?	_____	yes___no___
	1. Does the school maintain the original contract in their files?	_____	yes___no___

Reference	Question	Responsible Office	Response
	2. Does the school monitor compliance with the primary care health provider requirement?	_____	yes___no___
Campus-based Policy Memorandum, 96-1	M. Has the school identified (an) official(s) who can respond to students' questions about the PCL program?	_____	yes___no___
57.2905(c)	N. Does the institution make FADHPS disbursements according to the student's need for each academic period, rather than in one lump sum at the beginning of the academic year?	_____	yes___no___
Student Financial Aid Guidelines, Sec. 105.3.3	*NOTE: Dept. of HHS recommends that the institution disburse EFN according to the same procedures as FADHPS.*		
57.2807 57.2907	O. Does the institution maintain a separate account for funds awarded and make payments only for purposes stated in the regulations?	_____	yes___no___
58.2807(b) 58.2907(b)	P. Are payments terminated when the recipient ceases to be a full-time student or is not in good standing due to academic failure?	_____	yes___no___
	1. If the award is terminated before it is issued to the student, has the institution awarded the funds to another eligible student or, if no other eligible student can be located, returned the funds to the federal government?	_____	yes___no___
58.2807(b) Campus-based Policy Memorandum, 96-1	2. If a student's award is terminated after one or more disbursements have been made, and an unused balance remains, does the institution either: ▸ request additional funds from HHS to make up an award for another student; or ▸ remit the excess funds to HHS for deobligation?	_____	yes___no___
Campus-based Policy Memorandum, 96-1	Q. Has the school identified procedures it will use for certifying compliance with the service obligation and assuring that each recipient understands the responsibility to comply with	_____	yes___no___

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Reference		Question	Responsible Office	Response
		the procedures?		
Campus-based Policy Memorandum, 96-1	R.	Once recipients graduate, are they required to submit an annual self-certification of compliance with the primary care service obligation until the obligation is met?	_____	yes___no___
Campus-based Policy Memorandum, 96-1	S.	Does the school consider a recipient in default on the primary care service obligation if he or she fails to: ▸ complete the program; ▸ enter an approved primary care residency (for allopathic or osteopathic medicine); ▸ be able to complete a primary care residency (for allopathic or osteopathic medicine); ▸ practice primary care; or ▸ document residency status or primary care practice within 120 days of the due date?	_____	yes___no___
	T.	Within 30 days of the school determining that the recipient is in default, does the school report the defaulter to HHS?	_____	yes___no___
57.2810	U.	Does the institution provide and pay for biennial financial audits of its books, accounts, financial records, files and other papers and property?	_____	yes___no___
57.2810		1. Is the audit conducted using generally accepted auditing standards?	_____	yes___no___
		2. Are audit reports filed with the Secretary of Health and Human Services?	_____	yes___no___
		3. Are procedures and records established in such a manner as to provide for a detailed audit?	_____	yes___no___
57.2809 57.2909	V.	Does the institution maintain a record of all recipients of aid under this program which includes for each recipient: ▸ a copy of the total need analysis and determination of resources;	_____	yes___no___

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Reference	Question	Responsible Office	Response
	▸ documentation for any changes made to the need analysis report; ▸ documentation that the recipient met the eligibility requirements; ▸ a copy of the student budget used to determine the recipient's cost of attendance; and ▸ documentation of other sources of aid received by the recipient?		
57.2809 57.2909	W. Does the institution maintain a record of the amount of funds awarded to each recipient?	_____	yes___no___
57.2809 57.2909	X. Does the institution maintain a record of each institutional application for funding, including documentation to support the number of eligible students listed on each application and how they met the eligibility criteria?	_____	yes___no___
Campus-based Policy Memorandum, 96-1	Y. Beginning with the June 30, 1996, report, does the institution submit the Annual Operating Report to the Secretary, including information on the number of students who graduated 3 years prior, and the number of those graduates who were in primary care residency or practice during the their third post-graduate year?	_____	yes___no___

Comments on the Administration of Scholarships for Students of Exceptional Financial Need and Financial Assistance for Disadvantaged Health Professions Students _____

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XVI. Bureau of Indian Affairs (BIA)

Prepared by_____ Date_____
Reviewed by_____ Date_____

Note: Regulatory citations are provided where Title IV regulations apply. In other cases, questions are based on conventional procedures and good administrative practices.

Reference	Question	Responsible Office	Response
668.43(a)(1)	A. Does the institution publicize the special student aid funds available to qualified Native American students?	_____	yes___no___
668.43(a)(1)	B. Does the financial aid administrator attempt to identify students who may be eligible for BIA funds?	_____	yes___no___
	C. Is the institution aware that each applicant must:	_____	yes___no___
	▸ be a member of a federally recognized Indian tribe;		
	▸ be accepted for enrollment at a nationally accredited institution of higher education offering bachelor and or associate degree programs; and		
	▸ demonstrate financial need as determined by the financial aid office?		
	D. Are potentially eligible students informed of the possibility of receiving BIA funds and encouraged to apply for BIA funds, campus-based funds, and entitlement aid?	_____	yes___no___
673.6	E. Does the institution develop a financial aid package and award campus-based aid before determining the amount of financial need for a BIA grant?	_____	yes___no___
673.6(c)(1)	F. If the BIA grant, when combined with other aid in the package, exceeds the student's financial need, does the school deduct the excess from other assistance and ***not*** from the BIA grant?	_____	yes___no___
	1. Is the excess deducted from other assistance in the following sequence:	_____	yes___no___
	▸ loans;		
	▸ work-study;		
	▸ grants other than Federal Pell Grants?		

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Reference	Question	Responsible Office	Response
	NOTE: This order may be changed if the student requests, and if the school believes the change would benefit the student.		
	G. Are the necessary forms completed and transmitted to BIA for each eligible student?	_____	yes___no___
	H. Are recipients informed that they must reapply each year to establish eligibility for BIA funds?	_____	yes___no___
	I. Are recipients informed of the standards of satisfactory academic progress set by the BIA if such standards differ from institutional policy?	_____	yes___no___
	J. Are BIA funds disbursed to the student in the same manner as all other campus-based funds, where possible?	_____	yes___no___
	K. Is the student informed that BIA will require a report concerning his or her academic performance?	_____	yes___no___
	L. When a BIA recipient withdraws from school, does the institution immediately refund applicable BIA funds to the BIA agency according to the institutional refund policy?	_____	yes___no___

Other Recommended Good Practices for the BIA Program

Practice	Comments
1. If available, work with a local tribe's or reservation's educational officer.	
2. Most BIA Higher Education offices have limited funds and have priority dates for awarding BIA funds. Be sure to be familiar with the priority dates and complete the applications as soon as possible.	
3. Applications should not be submitted to the Office of Indian Education Programs in Washington, DC. For information, first call the tribe, agency/area education office, or, if this information is not available, contact the Branch of Post-Secondary Education in Washington, DC at (202) 208-4871.	

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Self-Evaluation Guide for Institutional Participation in Title IV and Other Federal Programs

Part 3: Administration of Financial Aid: Fiscal Responsibilities

Introduction

The responsibilities brought about by stewardship of federal, state, and institutional funds mandate internal control. Well documented systems and procedures, as well as the need to provide continuous training to sustain systems of internal control, are necessary to meet the institution's duties as a trustee of public funds. The purpose of this section of the *Self-Evaluation Guide for Institutional Participation in Title IV and Other Federal Programs* is to help institutions evaluate the adequacy of their internal controls. Federal regulations require that an institution establish and maintain an internal control system of checks and balances, and control and fund accounting procedures. The Department of Education's *Audit Guide* emphasizes systems of internal control over Title IV funds.

Several offices may be involved in the ongoing process of design and review of internal control systems. Institutions need to take advantage of all methods of review available to them, including self-evaluation, quality control, peer-evaluation, program reviews, and audits. An official audit represents only one phase of an evaluation spectrum. Institutional personnel in all phases of the financial aid function need to develop conscious evaluation attitudes.

The following questionnaire on fiscal administration is a general guide, not a set of hard and fast rules. It presents some key questions that form a basis for evaluating an institution's present internal controls. You are encouraged to tailor the evaluation to your institution by adding questions and modifying those included in this *Guide* where appropriate. The authors further encourage a sharing of the answers, which may represent opinions, with staff, peers, supervisors, auditors, and members of the financial aid office staff in order to provide instruction and, when necessary, a dialogue resulting in better understanding and consensus.

The delegation of responsibilities between the financial aid and fiscal offices varies considerably among institutions. The authors of this self-evaluation document mean to suggest no particular model. Ideally, the fiscal office and the financial aid office will conduct the self-evaluation as a cooperative project.

The Fiscal Office part of this *Guide* is divided into three sections: General Fiscal Administration (I), Drawing Down Funds (II), and Cash Management (III). Section I includes questions specific to accounting policies and procedures required by the federal regulations and other questions addressing generally accepted good accounting practices. Section III of the *Guide* reflects regulations that became effective beginning with the 1995-96 award year. The cash management regulations represent the Department of Education's efforts to consolidate regulations that were previously contained in the individual program regulations, as well as tighten some of the procedures used to maintain and disburse Title IV funds.

The goal of the institutional evaluation of fiscal procedures is to assure that the institution is properly administering the Title IV and Health and Human Services programs with adequate checks and balances in its internal controls and to be certain that adequate records are kept of all transactions involving student financial aid, thus providing a clear audit trail.

In July 1995, the Department of Education distributed the 1995 edition of *The Blue Book: Accounting, Record keeping, and Reporting By Postsecondary Educational Institutions for Federally-Funded Student Financial Aid Programs*. The *Blue Book* covers in detail the accounting, fiscal record keeping, and reporting requirements of the Title IV student financial aid programs. This document is a good reference source for both fiscal and financial aid administrators. The *Blue Book* should be used in conjunction with this self-evaluation guide.

NASFAA invites written comments on these or any other sections of this *Guide*. Comments should be sent to NASFAA, attention Marilyn LeBlanc.

I. General Fiscal Administration

Prepared by_____ Date_____
Reviewed by_____Date_____

Question **Response**

A. General Accounting:

1. Are fiscal procedures established in such a manner as to provide for a detailed audit? yes___no___n/a___

2. Are the accounting records for the entire institution audited periodically by an independent auditing agency? yes___no___n/a___

3. Are the accounting records for the institution's Federal student financial aid programs audited at least once every year by an independent auditing agency? yes___no___n/a___

4. Is a chart of accounts containing a description of each account in use? yes___no___n/a___

5. Is the chart of accounts consistent with the structure outlined in the *Blue Book*? yes___no___n/a___

6. Is an internal accounting manual in use? yes___no___n/a___

7. Are the accounting methods and procedures documented in writing and readily available to users of the system? yes___no___n/a___

8. Is the assignment of accounting duties and responsibilities expressed in the form of an organizational chart? yes___no___n/a___

9. Are all postings to general and subsidiary ledgers required to be supported by entries in books of original entry or journal entries? yes___no___n/a___

10. Are journal entries:

    a. Standardized for content and identification? yes___no___n/a___

    b. Supported by readily identifiable data? yes___no___n/a___

    c. Reviewed and approved by a responsible employee? yes___no___n/a___

Where computer equipment is utilized, complete the following:

11. Are batch controls (dollar amounts, cash totals, card counts, etc.) established by a responsible person, independent of data processing, prior to submission of data for processing? yes___no___n/a___

12. Is a system in place to verify the accuracy of input data (i.e. dollar amounts, identification numbers, etc.)? yes___no___n/a___

13. Are output data frequently compared to pre-determined totals by a responsible person independent of data processing, upon receipt of the information from the processing center? When input and output data do not agree, are:

    a. Differences properly identified? yes___no___n/a___

    b. Corrections properly authorized and approved? yes___no___n/a___

Question	Response
c. Re-work corrections properly controlled and accounted for in entirety?	yes___no___n/a___
14. Are printouts, summary proofs, etc., received from data processing:	
a. Adequate in terms of supporting data?	yes___no___n/a___
b. Useful in the event reconstruction becomes necessary?	yes___no___n/a___
c. Timely, in order to be useful?	yes___no___n/a___
15. For on-line systems, is an audit trail of all original and automatically generated entries readily available?	yes___no___n/a___
16. Where multiple data processing systems are utilized (i.e., accounting, financial aid, payroll, etc.) have the interfaces between systems been properly defined and documented as well as regularly audited?	yes___no___n/a___

B. Cash and Check Handling:

Cash, as the medium of exchange, is the most mobile asset. Routines and operating conditions should be designed to:

- Assure that a record is prepared for each cash transaction immediately upon its occurrence.
- Provide independent methods or persons not connected with the transactions to determine the amount of cash for which the teller, or other employees affected, must account. Practical precautions must be taken to prevent collusion between those handling cash and checks, and those accounting for it on the institution's books.
- Establish personal responsibility and accountability.
- Provide adequate physical facilities for safeguarding cash and the associated papers and instruments.

1. Are adequate physical facilities provided for safeguarding cash in the possession of cashiers or others authorized to handle cash? Are such facilities kept locked to prohibit access to non-authorized cash handlers?	yes___no___n/a___
2. Are procedures in place to prohibit or discourage cash payment by mail?	yes___no___n/a___
3. Are safe combinations and keys restricted to a minimum number of employees?	yes___no___n/a___
4. Are safes and registers locked at all times when unattended?	yes___no___n/a___
5. Are safe combinations changed periodically and at each change in personnel where responsibility existed?	yes___no___n/a___
6. Is the office containing the safe monitored by an alarm system during non-business hours?	yes___no___n/a___

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Question	Response
7. Are cash funds inventoried periodically on a surprise basis by a person independent of the fund?	yes___no___n/a___
8. Are cashiers forbidden to accept post-dated checks, IOU's or other evidence of loans without proper approval?	yes___no___n/a___
9. Are transfers between banks adequately controlled?	yes___no___n/a___
10. Are bank account reconciliations:	
a. Current?	yes___no___n/a___
b. Performed by person(s) distinct from those responsible for recording cash transactions?	yes___no___n/a___
11. Are bank statements delivered directly to the reconciler?	yes___no___n/a___
12. Are all cash receipts deposited intact daily?	yes___no___n/a___
13. Are cash receipt vouchers promptly completed and backed up with proper documentation?	yes___no___n/a___
14. Are written procedures in place to ensure that all checks and cash are received and deposited in a central location and do the procedures provide instructions for transmitting checks and cash to such location if they are received elsewhere on campus?	yes___no___n/a___
15. Is incoming mail opened by a responsible employee who has no connection with cash functions?	yes___no___n/a___
16. Is this person directed to report any irregularities noted to a supervisor?	yes___no___n/a___
17. Does this person prepare a list of remittances and turn this over with the remittance advices, letters, and envelopes to an employee of the accounting office other than the cashier for later checking against the deposit made by the cashier?	yes___no___n/a___
18. Is a deposit endorsement stamp applied immediately to all checks received?	yes___no___n/a___
19. Are duplicate receipted deposit slips returned by the bank to someone other than the person preparing deposits who compares them with details and/or a cash book?	yes___no___n/a___
20. Are cash receipt forms prepared for each transaction?	yes___no___n/a___
21. Are the cash receipt forms numerically controlled?	yes___no___n/a___
22. Are all cash receipts delivered directly to the cashier by the remitter to avoid handling by a third party?	yes___no___n/a___
23. Are cash and cash records completely separated from accounts receivable personnel?	yes___no___n/a___

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Question	Response
24. Is there an adequate control over returned or protested checks?	yes___no___n/a___
25. Is the cashing of checks payable to the school prohibited?	yes___no___n/a___
26. Is the control of all accounting records other than cash receipts and/or disbursement books vested in persons other than cashier?	yes___no___n/a___
27. Is proper authorization and approval required prior to disbursement of currency or checks?	yes___no___n/a___
28. Is final approval required for payment by someone other than the person originating the payment?	yes___no___n/a___
29. Is account distribution reviewed and authorized?	yes___no___n/a___
30. Are facsimile signature plates under the sole control of the signing employee?	yes___no___n/a___
31. Is a log maintained of the usage of signature plates?	yes___no___n/a___
32. Are checks that are mailed delivered direct to the mail clerk without again passing through the hands of the individual who authorized their issuance?	yes___no___n/a___
33. Are checks and drafts used in numerical sequence?	yes___no___n/a___
34. Are blank checks and drafts adequately safeguarded?	yes___no___n/a___
35. Is there an enforced rule against signing blank checks in advance?	yes___no___n/a___
36. Are vouchers and supporting papers effectively canceled upon payment, indicating "Paid?"	yes___no___n/a___
37. Are paid checks and drafts reviewed on a periodic sampling basis (including verification of proper endorsements)?	yes___no___n/a___
38. Are there safeguards in effect against use of duplicate invoices, statements or fictitious supporting documents?	yes___no___n/a___
39. Are periodic audits made to check for duplicate payments?	yes___no___n/a___
40. Are advance payments to students properly authorized and controlled?	yes___no___n/a___
41. Is the drawing of checks to "cash" or "bearer" prohibited?	yes___no___n/a___
42. Is altering or misstating dates of checks prohibited?	yes___no___n/a___
43. When an error is made on a check, is the check properly voided?	yes___no___n/a___
44. Are all voided checks accounted for?	yes___no___n/a___

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Question	Response

C. Payroll Accounting:

The payroll function in any institution, particularly in a large institution, is a widely dispersed operation. Good internal control helps provide the assurance that only authorized employees are carried on the rolls, and that rates of pay are correct.

1. Are additions of personnel to payroll, changes of pay rates, and terminations controlled through written authorization utilizing standardized forms? yes___no___n/a___
2. At the time of hiring, are gaps in employment history checked? yes___no___n/a___
3. Is a separate personnel folder originated for each new employee? yes___no___n/a___
4. Have all payroll authorization documents (including W-4's, etc.) been completed and submitted prior to the time of first payment? yes___no___n/a___
5. Is punching of time clock cards controlled either by observance of supervisor at starting and quitting times, or by placing clocks in conspicuous locations? yes___no___n/a___
6. Is there adequate control of clock cards of absentees and those who have terminated employment? yes___no___n/a___
7. Are supervisors prohibited from:
   a. Preparation of payrolls? yes___no___n/a___
   b. Disbursement of payrolls? yes___no___n/a___
8. Are those who prepare payrolls required to have written authorization from responsible persons outside the payroll department for:
   a. All rates and particularly for changes in rates? yes___no___n/a___
   b. Absences, overtime, and other allowances to be paid? yes___no___n/a___
9. Are hours worked by students, employees or supervisors always approved by someone other than themselves? yes___no___n/a___
10. Have all payroll time records been properly completed, approved and submitted the payroll department prior to published deadlines? yes___no___n/a___
11. Are payrolls occasionally checked against the records of the personnel department and/or Financial Aid Office to determine that student employees listed thereon are bona fide? yes___no___n/a___
12. Are checks, pay receipts or pay orders delivered by the payroll organization directly to supervisors? yes___no___n/a___
13. Are procedures in place to ensure that paychecks are given to proper payees? yes___no___n/a___

Question	Response
14. Are periodic payroll delivery audits performed?	yes___no___n/a___
15. Are signed receipts or cards required where payroll is paid in currency and coin?	yes___no___n/a___
16. Are unclaimed wages controlled by requiring the paymasters to turn over to another employee pay receipts plus unclaimed envelopes or checks for the total with which they were charged?	yes___no___n/a___
17. Is an effective system in place for keeping addresses current for proper mailing of W-2's (particularly for graduating or terminating students)?	yes___no___n/a___
18. Are payroll bank accounts reconciled by persons other than:	
a. Cashiers?	yes___no___n/a___
b. Persons preparing payroll?	yes___no___n/a___
c. Persons distributing payroll?	yes___no___n/a___
19. Are Immigration and Naturalization Service (INS) requirements regarding the documentation of identity and employment authorization met within 3 days of hiring?	yes___no___n/a___

D. Accounts Receivable Accounting:

Good control over tuition/fee receivables and loan receivables is desirable as these activities govern the income to the institution. The organizational structure should provide a proper segregation of duties so that no one person or department handles all the functions of a receivable transaction. There should exist a clear line of demarcation between cashiers, bookkeeping clerks, billing clerks, accounting staff, financial aid staff, investment personnel, etc.

The following should be required:

- Separation of duties.
- Enforced rules with respect to granting credit by deferring cash payments and advancing loans.
- Accounting of prenumbered forms.
- Establishment of approval procedures.
- Supervisory review and scrutiny.

1. Are the credit and loan responsibilities clearly designated?	yes___no___n/a___
a. Is the granting of loans carefully checked prior to disbursement?	yes___no___n/a___
b. Are credit limits and loan limits established, understood, and adhered to?	yes___no___n/a___

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Question	Response
c. If applicable, are all new student accounts approved for credit as opposed to automatic clerical set-up (to prevent bogus receivables being set up)?	yes___no___n/a___
d. If applicable, is all credit (deferment of payment) for unpaid student-owed refunds and unpaid prior academic period balances approved on an exception basis?	yes___no___n/a___
2. Are charges for tuition, housing rent, fees, food, bookstore purchases, telephone services, etc., not paid for in advance or at the time of purchase, recorded in separate subsidiary accounts controlled by the institution's general ledger?	yes___no___n/a___
3. Are all accounts receivable ledgers balanced monthly with the general ledger control accounts?	yes___no___n/a___
a. Is the trial balance of subsidiary accounts receivable reviewed in detail by a manager at least quarterly?	yes___no___n/a___
b. Are accounts receivable aged regularly?	yes___no___n/a___
c. Is a schedule of aged accounts receivable distributed to the Credit/Collections Manager?	yes___no___n/a___
d. Are bad debts adequately supervised and recoveries controlled?	yes___no___n/a___
e. Is a record maintained of items written off and subsequent recoveries thereon by an employee not connected with the Accounts Receivable Department or with the handling of cash?	yes___no___n/a___
f. Are periodic billing statements mailed to students with unpaid balances?	yes___no___n/a___
g. Do bills and statements request students to make or endorse all checks payable only to the institution?	yes___no___n/a___
4. Is the accounts receivable function separated from the cash function?	yes___no___n/a___
5. Are account adjustments properly authorized and approved?	yes___no___n/a___
6. Is the proper procedure followed for authorization of bad debt write-offs?	yes___no___n/a___
7. Are internal routines (i.e., for billing accounts receivable, advancing loans, and collecting payments) under adequate control so that no one person has control over several activities?	yes___no___n/a___
8. Does the Billing Department receive from the Registrar a record of all student enrollment and from the financial aid office a record of all aid to be applied to charges?	yes___no___n/a___
9. Does the institution have a written refund policy?	yes___no___n/a___
a. Is the refund policy understood by the staff preparing the refund calculation?	yes___no___n/a___

Question	Response
b. Do the refund memoranda bear proper approval?	yes___no___n/a___
c. Are limits established for special approval of refund allowances? (For example, for a refund over $1,000 is approval required from a financial officer, such as the controller, bursar, or vice president?	yes___no___n/a___
10. Are discrepancies and complaints reported by students given adequate attention?	yes___no___n/a___
11. Are loans disbursed only on the basis of properly approved documentation from authorized Financial Aid officers or an appropriate Student Affairs executive?	yes___no___n/a___
12. Are all deferments made only by staff responsible for collections?	yes___no___n/a___
13. Is proper documentation of deferments (i.e., notes signed by students) maintained?	yes___no___n/a___
14. Are policies in place and followed relative to what activities can take place if student bills have not been paid?	yes___no___n/a___
15. Are internal routines properly supervised and controlled?	yes___no___n/a___

E. Plant Protection and Physical Accommodations of Fiscal Records:

While most of our internal controls are designed to preclude errors or to prevent fraud and dishonesty on the part of employees, the security measures taken to provide the maximum protection of the contents of buildings and storage areas should be considered as part of the overall study of internal controls.

1. Are the building and property protected by secure doors, locks, etc.?	yes___no___n/a___
2. Are repairs made promptly?	yes___no___n/a___
3. Are visitors and outsiders restricted to the areas in which they have business?	yes___no___n/a___
4. Are security personnel provided with written rules on:	
a. Frequency of inspection tours and areas to be covered?	yes___no___n/a___
b. How to handle visitors?	yes___no___n/a___
c. Whom to admit and when?	yes___no___n/a___
d. Keeping signature records of those admitted before and those leaving after regular hours?	yes___no___n/a___
e. Showing time and purpose of visit?	yes___no___n/a___
f. In lieu of security, is degree of police protection adequate and routine?	yes___no___n/a___
5. Is there a system in place (such as a central file) by which positive control over all documents is maintained?	yes___no___n/a___

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Question	Response
6. Is a control system in effect whereby a record is maintained for all documents and equipment that leave the premises?	yes___no___n/a___
7. Are records maintained of employees in possession of keys to entrance doors, gate locks, storage areas, file rooms, etc., requiring limited access?	yes___no___n/a___
a. Are the keys given to only responsible employees?	yes___no___n/a___
b. Are locks changed concurrent with termination or transfer of responsible employees?	yes___no___n/a___
8. Are all legal ledgers required to be kept under record retention rules, stored in a fireproof safe or vault?	yes___no___n/a___
9. Are promissory notes and student loan ledgers kept in a locked, fire-resistant cabinet or container?	yes___no___n/a___
10. Do only authorized personnel have access to these documents?	yes___no___n/a___
11. If the department utilizes computers in its operations, are backup copies of disks and tapes maintained in a location separate from where the originals are maintained?	yes___no___n/a___
12. Are the sections of the Fiscal Office dealing directly with students conveniently located and accessible to handicapped students? [P.L. 93-112 S504 HEW Reg. (84.46)(a)]	yes___no___n/a___

Other recommended good practices regarding facilities:

Quarters should be adequate in terms of space, noise level, lighting.

The layout of the department should be efficient.

The total office space and arrangement should enhance the functions of the office. Provision should be made for privacy during and after working hours to protect confidentiality, especially for a data processing department and/or a computing center. For example, the reception area, the data entry area, the programming offices, and the computer's central processing unit hardware should all be separated.

F. Fiscal Organizing and Controlling:

Organizing is arranging, establishing, instituting, and bringing into being -- it is the classification of activities of a group of individuals united in working toward a common goal. Its purpose is to achieve the most effective utilization of available resources. It involves structuring the organization to reflect the flow of work and the need for cooperative effort between individuals, groups, departments, functions, etc. It involves staffing the positions with qualified people. It involves establishing clear lines of authority and responsibility.

Question	Response

Controlling is verifying whether everything occurs in conformity with the plan adopted, the instructions issued, and the principles established. Its purpose is to point out weaknesses and errors in order to correct them and prevent recurrence. It includes the establishment of standards, the measurement of performance, and the correction of deviations. To be effective, controlling requires, at a minimum, the following:

- Identifying key factors to be controlled to achieve results.
- Specifying the basis for establishing standards of performance.
- Defining the information that must be accumulated to measure performance.
- Establishing a reporting structure that identifies performance, relates causes and effects, signals trends, and identifies results by responsibility.

1.	Have the roles of the various fiscal sub-departments been defined in writing?	yes___no___n/a___
2.	Is a system in place for the periodic review of sub-department roles?	yes___no___n/a___
3.	Have these roles been communicated to other departments in some form of institution-wide administrative procedures?	yes___no___n/a___
4.	Has authority been delegated to carry out these roles?	yes___no___n/a___
5.	Do fiscal officers and financial aid staff meet regularly to discuss the roles of each area in carrying out responsibilities relative to the entire financial aid function?	yes___no___n/a___
6.	Have managers specified how the departments' performances are to be measured:	
	a. Staying within the budget?	yes___no___n/a___
	b. Recovery of operating costs?	yes___no___n/a___
	c. Number of people?	yes___no___n/a___
	d. Feedback from other departments?	yes___no___n/a___
	e. Personal judgment?	yes___no___n/a___
	f. Cost savings?	yes___no___n/a___
	g. Student and employee complaints?	yes___no___n/a___
	h. Schedule performance?	yes___no___n/a___
	i. Accomplishment of objectives?	yes___no___n/a___
7.	Have department objectives been established in writing?	yes___no___n/a___
8.	Is accomplishment of objectives reported regularly?	yes___no___n/a___

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Question	Response
9. Is nonaccomplishment reviewed with the department manager (or supervisor): Verbally? In writing?	yes___no___n/a___
10. Is management satisfied with the department's overall performance?	yes___no___n/a___
11. Are there any particular areas or problems in the department which should be reviewed?	yes___no___n/a___
12. Does the department have an annual operating plan?	yes___no___n/a___
a. Does it also have a long-range operating plan?	yes___no___n/a___
b. Is the plan broken down into definable projects?	yes___no___n/a___
c. Do these projects have detailed schedules?	yes___no___n/a___
d. Do all levels of supervision participate in planning?	yes___no___n/a___
e. Are senior officers aware of the plan?	yes___no___n/a___
f. Have senior officers approved the plan?	yes___no___n/a___
g. Are all employees in the fiscal department aware of the plan?	yes___no___n/a___
h. Have responsibilities been assigned to carry out the plan?	yes___no___n/a___
i. Is performance against the plan measured?	yes___no___n/a___
j. Are changes in the plan communicated up and down the line?	yes___no___n/a___
k. Are there minimal changes to the plan?	yes___no___n/a___
l. Does the plan contain units of measure such as costs, number of employees, dates, etc.?	yes___no___n/a___
m. Are reports of progress against the plan issued periodically?	yes___no___n/a___
13. Have any fiscal sub-department or section staffing problems been resolved?	yes___no___n/a___
14. Is management satisfied with the quality of personnel in the fiscal department?	yes___no___n/a___
15. Does the department have any formal on-the-job training program?	yes___no___n/a___
16. Are employees encouraged to take appropriate training courses?	yes___no___n/a___
17. How is an individual's performance measured?	
a. by objectives?	yes___no___n/a___
b. by work measurement?	yes___no___n/a___

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Question	Response
c. by other standards? (list below)	yes___no___n/a___
_____	yes___no___n/a___
_____	yes___no___n/a___
_____	yes___no___n/a___
18. Do employees know how they are measured, such as by periodic or annual performance reviews?	yes___no___n/a___
19. Is performance measured regularly?	yes___no___n/a___
20. Are job descriptions written for each position?	yes___no___n/a___
21. If turnover has been a problem, has management made an effort to determine the cause of the turnover and to eliminate the cause if possible?	yes___no___n/a___
22. Are there adequate advancement opportunities?	yes___no___n/a___
a. Are they in the department?	yes___no___n/a___
b. Outside the department?	yes___no___n/a___
23. Are employees aware of these opportunities?	yes___no___n/a___
24. Does the department have formal organization charts?	yes___no___n/a___
25. If there are an excessive number of people and/or functions reporting to any one supervisor in the fiscal department, is an effort being made to correct this situation?	yes___no___n/a___
26. A **policy** is a guide for carrying out action in order to achieve objectives. It is effective until it is either replaced or declared invalid.	
a. Does the fiscal department have written policies?	yes___no___n/a___
b. Are they organized in a manual?	yes___no___n/a___
c. Are they up-to-date?	yes___no___n/a___
d. Are they enforced?	yes___no___n/a___
e. Are they distributed to personnel in the department?	yes___no___n/a___
f. Are they distributed to other departments as appropriate?	yes___no___n/a___
g. Are they clearly written?	yes___no___n/a___
h. Is the format standardized?	yes___no___n/a___

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Question	Response
27. **Procedures** explain the steps to be taken in order to carry out the policies. Procedures minimize the chance for irregularities or improper practices and act as a reference in determining that policies are carried out.	
a. Does the department have written procedures?	yes___no___n/a___
b. Are they organized in a manual?	yes___no___n/a___
c. Are they up-to-date?	yes___no___n/a___
d. Are they monitored for compliance?	yes___no___n/a___
e. Is a procedure written for all policy statements?	yes___no___n/a___
f. Are written procedures distributed to the responsible personnel?	yes___no___n/a___
g. Is the format standardized?	yes___no___n/a___
28. **Forms** is a general term and refers to the information and the media used in the formal written communication system of the department and the institution as a whole. It would include such items as purchase orders, invoices, check vouchers, student billings, time cards, financial aid disbursement orders, etc.	
a. Does the fiscal department have a forms control program?	yes___no___n/a___
b. Is the program consistent with the institution's other departments?	yes___no___n/a___
c. Does it utilize a system of inventory control and replenishment?	yes___no___n/a___
29. **Files** constitute the formal storage of information in a department. This term includes computer files, filing cabinets, tub files, notebooks, etc., for the purpose of reference.	
a. Is access to departmental files unrestricted?	yes___no___n/a___
b. Do files document entire transactions accurately and in one place?	yes___no___n/a___
c. Are files purged according to a planned records retention program?	yes___no___n/a___
d. Is there a procedure covering records retention?	yes___no___n/a___
e. Is there a procedure to control purging of records no longer required?	yes___no___n/a___
f. Does it comply with institutional policy?	yes___no___n/a___
30. **Control** is impaired unless steps are taken to measure results against anticipated standards of performance. These indicators point up situations requiring attention by management and would include forecasts and budgets:	
a. Has a reporting structure been established that identifies performance?	yes___no___n/a___

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Question	Response
b. Are reports:	
▸ prompt?	yes___no___n/a___
▸ accurate?	yes___no___n/a___
▸ concise?	yes___no___n/a___
▸ impartial?	yes___no___n/a___
▸ are they used?	yes___no___n/a___
c. Does the fiscal department prepare the institution's annual budget?	yes___no___n/a___
d. Is this budget approved by the top level of management?	yes___no___n/a___
e. Do supervisors and staff participate in budget preparation?	yes___no___n/a___
f. Are budgets modified when conditions change?	yes___no___n/a___
g. Are regular reports, showing actual costs and variance, provided for all institutional departments?	yes___no___n/a___
h. Are large variances explained?	yes___no___n/a___
i. Does the budget provide for such things as:	
▸ gift income resources?	yes___no___n/a___
▸ restricted endowment earnings?	yes___no___n/a___
▸ tuition income?	yes___no___n/a___
▸ student labor--actual versus forecast?	yes___no___n/a___
▸ scholarship commitments (disbursed and unexpended)?	yes___no___n/a___
▸ loan commitments, disbursements, and collections?	yes___no___n/a___
▸ financial aid matching resources?	yes___no___n/a___
▸ staff labor and employee benefits by department throughout the institution?	yes___no___n/a___
▸ expended supplies, travel, professional development, equipment, computer usage, etc.?	yes___no___n/a___
▸ administrative allowances from Federal programs?	yes___no___n/a___
▸ student aid budget models for long range planning?	yes___no___n/a___

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Question	Response
31. Has any audit or appraisal ever been made of the fiscal department or portions thereof (i.e., as part of an auditor's Management Letter)?	yes___no___n/a___
If so, give most recent date below:	
▸ By the public accountants_____	
▸ By government auditors _____	
▸ By consultants_____	
▸ By management_____	
▸ Other: _____	
32. Are the results of appraisals available in writing?	yes___no___n/a___
33. Does the fiscal department prepare and issue routine statistical reports?	yes___no___n/a___
34. On these statistical reports, do the dollar amounts "tie-in to the books?"	yes___no___n/a___
35. Are Error Logs maintained and utilized as a method of tracking errors?	yes___no___n/a___
36. Are any reports issued on special program items such as:	
a. Student aid overawards?	yes___no___n/a___
b. FWS overtime wages?	yes___no___n/a___
c. FWS wages paid exceeding amounts awarded?	yes___no___n/a___
d. FWS fund over-utilization?	yes___no___n/a___
e. Federal Perkins Loan fund over-utilization?	yes___no___n/a___
f. Delinquent student accounts receivable?	yes___no___n/a___
g. Delinquent loan accounts?	yes___no___n/a___
h. Staff employee overtime salaries?	yes___no___n/a___
i. Scholarship funding projected shortfalls?	yes___no___n/a___
j. Scholarship funding over-expenditures?	yes___no___n/a___
k. Other:	yes___no___n/a___
_____	yes___no___n/a___
37. Is there evidence of any action being taken as a result of issuing these reports?	yes___no___n/a___

Question	Response
38. Are these fiscal reports reviewed for accuracy and approved for release?	yes___no___n/a___
39. Are these fiscal reports distributed to:	
a. Top management?	yes___no___n/a___
b. Respective department directors?	yes___no___n/a___
c. Internal auditors?	yes___no___n/a___
d. Internal management advisors?	yes___no___n/a___
e. Other:	yes___no___n/a___
40. Are reports reviewed periodically to determine whether or not they are meeting their intended purposes and are reaching appropriate audiences?	yes___no___n/a___

Describe:

Comments on the Administration of the Fiscal Office _____

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II. Drawing Down Federal Funds

Prepared by_____ Date_____
Reviewed by_____Date_____

The Department of Education Grants Administration and Payment System (GAPS), which replaced the Payment Management System (ED/PMS), and the Department of Health and Human Services Payment Management System (DHHS/PMS) provide(s) respective recipients with readily identifiable points of contact for cash matters. The system provides uniform standards for cash management and disbursement reporting.

Reference	Question	Responsible Office	Response
	Department of Education Programs		
●The Blue Book, July 1995, p.87 DCL GEN-98-9	A. ●Is the institution aware that all Title IV funds (excluding FFEL) are requested through the Department of Education Payment Management System (ED/PMS)? *NOTE: Beginning May 13, 1998, the ED/PMS System has been replaced by the Department of Education's Grants Administration and Payment System (GAPS).*	_____	yes___no___
DCL GEN-98-9	1. ●Is the institution aware that because the transition from ED/PMS to GAPS necessitated that institutions not draw down funds between April 23, 1998, and May 13, 1998, ED instructed institutions to request all Title IV funds (except FFEL) that they reasonably expected to disburse or deliver to all eligible student or parent borrowers within that transition period?	_____	yes___no___
DCL GEN-98-9	a. ●Does the institution understand that ED allowed these funds to be drawn down, even if the institution did not anticipate disbursing those funds within three business days of receipt?	_____	yes___no___
DCL GEN-98-9	b. ●Does the institution understand that ED will not count these funds for purposes of determining excess cash under Subpart K of the General Provisions regulations?	_____	yes___no___
GAPS Payee Guide, Nov. 1997, p. 3	B. Is the institution aware that GAPS provides continuous on-line capabilities to request payments and to monitor grant and payment information including available balances?	_____	yes___no___
GAPS Payee Guide, Nov. 1997, p. 25	C. Does the institution request funds for each Title IV program (excluding FFEL) on-line through GAPS External Access system, or by telephone	_____	yes___no___

Reference	Question	Responsible Office	Response
	through the Department of Education's service bureau?		
GAPS Payee Guide, Nov. 1997, p. 25	1. Does the institution request funds to meet its immediate need for each Title IV program (except FFEL) by individual grant award number?	_____	yes___no___
GAPS Payee Guide, Nov. 1997, p. 53	a. Does the institution ensure that excess cash is not maintained, and return any funds that it does not spend within three business days of receipt?	_____	yes___no___
	i. Does the institution reconcile its grant awards on a regular basis, to ensure that GAPS has accurate award data?	_____	yes___no___
GAPS Payee Guide, Nov. 1997, p. 34	b. Does the institution access Direct Loan funds through GAPS only if it participates in the Direct Loan program under loan origination Level 1?	_____	yes___no___ n/a___
GAPS Payee Guide, Nov. 1997, p. 35	i. Is the institution aware that if it participates in Direct Loan under loan origination Level 2 or alternative origination (Level 3), the Direct Loan Servicing Center handles requests for funds?	_____	yes___no___ n/a___
●The Blue Book, July 1995, p.87 GAPS Payee's Guide, November 1997, pp. 29-33	2. Does the institution understand that there are two methods, Automated Clearinghouse Electronic Funds Transfer (ACH/EFT), and Federal Electronic Fund Transfer (FEDWIRE), that institutions use to obtain federal cash?	_____	yes___no___
	a. Is the institution aware that the Federal Electronic Fund Transfer (FEDWIRE) system provides payment of funds to recipients by direct wire transfer by the Federal Reserve Communications System through the Federal Reserve Bank on the next business day following receipt of the request?	_____	yes___no___
The Blue Book, July 1995, p. 87 GAPS Payee's	3. Does the institution understand that unless it has been informed otherwise by the Department of Education, the institution	_____	yes___no___

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Items marked ● applied to 1997-98 but not to subsequent years
Items marked ✦ are effective beginning 1998-99

Reference	Question	Responsible Office	Response
Guide, November 1997, pp. 25-28	receives Title IV funds (except FFELP), through the Advance Payment Method?		
668.162(b)(1)	a. Does the institution limit its request for funding to the amount needed to make immediate disbursements to eligible students and parents?	_____	yes___no___ n/a___
668.162(b)(3)	b. Does the institution disburse requested funds within three business days of receipt?	_____	yes___no___ n/a___
The Blue Book, July 1995, p.88 GAPS Payee's Guide, November 1997, pp. 27-28	4. Does the institution understand that it will only be placed on the Reimbursement Payment Method if the Department of Education determines that there is a need to more strictly monitor the institution's participation in the Title IV programs?	_____	yes___no___
668.162(d)(3)	a. Does the institution identify students for whom reimbursement is sought, and submit documentation that shows each applicant included in the request was eligible to receive those Title IV funds?	_____	yes___no___ n/a___
668.162(d)(1)	b. Does the institution limit its request for funds to the amount disbursed to individuals identified in the reimbursement request?	_____	yes___no___ n/a___
668.167(d)(1)(i)	c. Does the institution ensure that if it has been placed on the Reimbursement Payment Method, it does not disburse FFEL funds to borrowers until it submits required documentation and receives approval from the Department of Education?	_____	yes___no___ n/a___
668.167(d)(1)(ii)	d. If required, does the institution delay certification of FFEL applications until approval is received from the Department of Education?	_____	yes___no___ n/a___
✦668.175(d)(2) FR 11/25/97, p. 62836	5. ✦Is the institution aware that it will only be placed on the Cash Monitoring Payment Method if: ▸ it is a proprietary or private non-profit institution judged not to be financially	_____	yes___no___

Reference	Question			Responsible Office	Response
			responsible solely because of a composite score of 1.0 to 1.4 as calculated under 668.172 of the Financial Responsibility subpart of the General Provisions Regulations; *OR*		
✦668.162(e)		▸	the Department of Education determines that there is a need to more strictly monitor the institution's participation in the Title IV programs?		
✦668.162(e)		a.	✦If placed on Cash Monitoring Payment Method Type 1, does the institution credit students' accounts before drawing down federal funds?	_____	yes___no___ n/a___
✦668.162(e)(1)			i. ✦If placed on Cash Monitoring Payment Method Type 1, does the institution request funds through GAPS?	_____	yes___no___ n/a___
✦668.162(e)		b.	✦If placed on Cash Monitoring Payment Method Type 2, does the institution credit students' accounts and provide all documentation requested by the Department of Education before requesting federal funds?	_____	yes___no___ n/a___
✦668.162(e)(2)			i. ✦If placed on Cash Monitoring Payment Method Type 2, does the institution request funds by following the procedures required of institutions placed on the Reimbursement Payment Method?	_____	yes___no___ n/a___
668.162(c) 1998-99 FSFA Handbook, p. 58	6.		Is the institution aware of the Just-in-time Payment Method, in which institutions electronically transmit student level payment data to the Department of Education, and based upon disbursement dates provided by institutions, receive funds through ACH/EFT? *NOTE: Although regulations initiating the Just-in-time Payment Method were effective July 1, 1997, implementation has been delayed. The Department of Education plans to publish a Notice in the Federal Register indicating the effective date of this*	_____	yes___no___

Reference	Question	Responsible Office	Response
	payment method. At this time, ED expects that participation in Just-in-time will be voluntary.		
●The Blue Book, July 1995, p.89	7. Does the institution follow the procedures for receiving funds contained in:		
	▸ ●The *Recipient's Guide for the Department of Education Payment Management System* (October 1995) (for funds requested through April 23, 1998); AND	_____	yes___no___
	▸ *The Grants Administration and Payment System (GAPS) Payee Guide* (November 1997) (for funds requested after May 11, 1998).	_____	yes___no___
	Department of Health and Human Services		
	A. Is the institution aware that there are two methods for obtaining federal cash through the Department of Health and Human Services Payment Management System DHHS/PMS?	_____	yes___no___
	▸ Cash Line This method is a voice response telephone system. Institutions draw down funds to meet immediate needs; funds are transferred to the institution's account the next business day via the Federal Reserve through the Automated Clearing House (ACH).		
	▸ SMARTLINK II This electronic funds transfer payment system requires a PC, modem, communications capabilities, and a direct telephone line. Requests for funds may be made daily or weekly; payment is made through the Automated Clearing House (ACH).		
	1. Are all appropriate payment guides and manuals on file?		
	a. *The DHHS Manual for Recipients Financed Under the Payment*	_____	yes___no___ n/a____

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Reference	Question	Responsible Office	Response
	Management System (PMS), January 1994 (DHHS/PMS).		
	b. SMARTLINK II Users Guides and Technical Guides, April 1994.	_____	yes___no___ n/a___
	c. *Cashline, the Payment Management System Voice Response Unit User's Guide*, January 1994.	_____	yes___no___ n/a___
	B. Draw Down procedures for Cash Advance Recipients:		
	1. Is the appropriate authorization documentation on file?	_____	yes___no___ n/a___
	2. Is the proper security provided for the password/access code?	_____	yes___no___ n/a___
	3. Are the appropriate request for fund forms on file?	_____	yes___no___ n/a___
	4. To insure fiscal accountability under the drawdown system, does your institution have sufficient cash control procedures to provide:	_____	yes___no___ n/a___
	a. accurate, current, and complete financial reports for each award program?	_____	yes___no___ n/a___
	b. records identifying the source and use of funds for award-supported activities?	_____	yes___no___ n/a___
	c. effective control over and accountability for all funds, property, and other assets?	_____	yes___no___ n/a___
	d. comparison of actual outlays and budgeted amounts for each award?	_____	yes___no___ n/a___
	e. procedures to minimize the time between draw down of federal funds and disbursement of those funds?	_____	yes___no___ n/a___
	f. accounting records that are supported by source documentation such as original invoices, purchase orders, etc.?	_____	yes___no___ n/a___

Reference	Question	Responsible Office	Response
	g. a systematic method to quickly and appropriately resolve audit findings and recommendations?	_____	yes___no___ n/a___
	5. Does the institution always verify that funds were deposited in its bank account before making aid disbursements?	_____	yes___no___ n/a___
	Financial Reporting for ED and HHS Programs		
●The Blue Book, July 1995, pp. 246-253	A. Does the institution complete and submit the following reports within the applicable time frame for HHS program funds (● and for Department of Education program funds drawn down through ED/PMS)?	_____	yes___no___ n/a___
DHHS Manual for Recipients Financed Under the Payment Management System (PMS), January 1994	▸ Status of Federal Cash (PMS 272); ▸ Federal Cash Transaction Report (PMS 272-A); and ▸ Statement of Cash Accountability (PMS 272-B)?		
	1. Are copies of these reports readily accessible?	_____	yes___no___ n/a___
	2. Are these reports complied by dates when due, as requested from PMS?	_____	yes___no___ n/a___
	3. Is the cumulative expenditure information sent by the institution based on accurate expenditure data?	_____	yes___no___ n/a___
	4. Are accounting records posted and balanced frequently enough to enable cash to be drawn as close to immediate disbursement needs as is administratively feasible?	_____	yes___no___ n/a___
	5. Is there any stockpiling of funds, as evidenced by unusually high cash balances?	_____	yes___no___ n/a___
	6. Are estimates realistic, with references to actual need and acceptable budget estimating practices?	_____	yes___no___ n/a___
	7. Are the federal share of refunds, rebates, audit adjustments, or other adjustments transacted and reported in a timely manner?	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
	8. Is refunded cash used for current program disbursement needs before additional program funds are withdrawn from ED or HHS?	_____	yes___no___ n/a___
	9. Are discrepancies between the institution's records and the PMS computer database (i.e., miscoding, wrong amounts authorized, etc.) noted on reports returned to the Department?	_____	yes___no___ n/a___
	10. Are unresolved discrepancies being followed up in a timely manner by correspondence and/or telephone calls with PMS?	_____	yes___no___ n/a___
Update to the GAPS Payee Guide, March 5, 1998	11. Is the institution aware that under GAPS, it is no longer required to report expenditures because ED will consider each grant award expended when the funds are drawn down by the institution?	_____	yes___no___
	a. Does the institution compare its Quarterly Reconciliation Statement with institutional records to ensure that it has accurately reported expenditures to GAPS?	_____	yes___no___
GAPS Payee Guide, November 1997 p. 38	b. Does the institution understand that it may redistribute its drawdown requests between grant awards (except Direct Loan), so long as another award has sufficient available funds from which to draw?	_____	yes___no___
	i. If the institution does redistribute its drawdowns, does it report all changes to GAPS?	_____	yes___no___

Conclusion

The Departments of Education and Health and Human Services have made significant strides in streamlining the procedures for drawing down federal student aid funds. Efforts are continuing at both Departments to further automate procedures. Administrators should be alert to memoranda announcing such changes and providing directions as to how institutions desiring to take advantage of such improvements can do so.

III. Cash Management

Prepared by_____ Date_____
Reviewed by_____ Date_____

Reference	Question	Responsible Office	Response
668.161(a)	A. Does the institution promote sound cash management of Title IV program funds by following cash management rules set forth in 34 CFR Part 668, subpart K?	_____	yes___no___
	1. Are procedures in place to ensure that financing costs to the Federal government for making Title IV program funds available are minimized?	_____	yes___no___
	2. Are procedures in place to minimize costs that accrue to a student under a Title IV loan program?	_____	yes___no___
668.161(b)	B. Does the institution neither use nor hypothecate (i.e., use as collateral) Title IV funds for any purpose other than to hold the funds in trust for the intended students or the Secretary? *NOTE: The only exceptions are for funds received for administrative expenses and funds used for the Job Location and Development Program.*	_____	yes___no___
668.162(b)(1),(3)	C. If the institution receives Title IV program funds under the Advance Payment Method, does the institution's cash request represent an amount needed to make disbursements for no more than three business days following the date the institution receives the funds?	_____	yes___no___ n/a___
668.162(d) ✦668.162(e)	D. If the institution receives Title IV program funds under the Reimbursement Payment Method, or Cash Monitoring Payment Method, does the institution have in place procedures necessary to comply with any special requirements directed by the Department of Education?	_____	yes___no___ n/a___
668.167(d)(1)(i)	1. Does the institution ensure that if it has been placed on the Reimbursement Payment Method, it does not disburse FFEL funds to borrowers until it submits required documentation and receives approval from the Department of Education?	_____	yes___no___ n/a___
668.167(d)(1)(ii)	a. Does the institution delay certification of FFEL applications until approval is received from the Department of	_____	yes___no___ n/a___

Reference	Question	Responsible Office	Response
	Education, if it has been instructed to do so?		
✦668.162(e)	2. ✦If placed on the Cash Monitoring Payment Method, does the institution make disbursements to students and parents before submitting a request for funds under the Advanced Payment Method, or seeking reimbursement for those disbursements?	_____	yes___no___ n/a___
668.167(a)(1)(ii)	E. If the institution receives FFEL Program funds by EFT or master check, does the institution request EFT or master check funds for students not subject to delayed disbursement requirements, no earlier than 13 days before the first day of classes for the payment period?	_____	yes___no___ n/a___
668.167(a)(2)(ii)	F. If the institution receives FFEL Program funds by individual check, does the institution request the check for students not subject to delayed disbursement requirements, no earlier than 30 days before the first day of classes for the payment period?	_____	yes___no___ n/a___
668.167(a)(1)(i)	G. If the student is a first-time, first-year borrower, does the institution request funds via EFT or master check, no earlier than 27 days after the first day of classes of the first payment period?	_____	yes___no___ n/a___
668.167(a)(2)(i)	H. If the student is a first-time, first-year borrower, does the institution request funds by individual check, no earlier than the first day of classes of the first payment period?	_____	yes___no___ n/a___
668.163(c)(1)	I. Does the institution maintain Federal Perkins Loan funds in an interest-bearing or investment account?	_____	yes___no___ n/a___
668.163(c)	J. For Title IV funds other than Federal Perkins and FFEL, does the institution maintain Title IV program funds in an interest-bearing or investment account unless one of the following conditions applies:		
668.163(c)(3)	▸ in the prior award year, the school drew down less than $3 million from the Title IV programs (including funds drawn down for the Federal Perkins Loan program) and will not drawdown more than $3 million in the	_____	yes___no___ n/a___

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Items marked ✦ are effective beginning 1998-99.

Reference	Question	Responsible Office	Response
	current award year;		
	▸ the institution demonstrates by its cash management practices, that it will not earn more than $250 in interest by maintaining drawn down funds in an interest-bearing account during the current award year (excluding interest earned on the Federal Perkins Loan account); or	_____	yes___no___ n/a___
668.163(c)(3)(iii)	▸ the institution requests funds under the Just-in-time payment method? *NOTE: Although the Just-in-time Payment Method became effective July 1, 1997, the Department of Education has delayed its implementation. When it is implemented, ED's intent is that participation in this payment method will be voluntary.*	_____	yes___no___ n/a___
668.163(a)(2) 1998-99 FSFA Handbook, p. 3 - 60	1. Has the institution notified the bank of the accounts that contain Federal funds, and is a copy of such notification retained by the institution, or has the institution ensured that the name of the account includes the words "federal funds?"	_____	yes___no___
668.163(a)(2)(ii)(B) 1998-99 FSFA Handbook, p. 3 - 60	2. Has the institution (if it is not a public institution) filed with the appropriate state or municipal government entity a UCC-1 form and maintained a copy for its records if the name of the account does not include the words "federal funds?"	_____	yes___no___ n/a___
668.163(b)	3. If the Secretary requires the institution to maintain a separate account for Title IV funds, that contains no other funds, does the institution comply with this requirement?	_____	yes___no___ n/a___
668.163(a)(1)	K. Are all accounts in which Title IV funds are maintained either:		
	▸ federally insured; or	_____	yes___no___
	▸ secured by collateral that is approximately the same value as the Title IV funds in the account?	_____	yes___no___

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Reference	Question	Responsible Office	Response
668.163(c)(1),(2)	L. If the institution maintains federal funds in an investment account, does the account predominantly consist of low-risk income producing securities and does the institution maintain sufficient liquidity in that account to make required disbursements to students?	_____	yes___no___ n/a___
668.163(c)(4)	M. With the following exceptions, does the institution, at least annually, pay ED the interest or investment revenue earned on Title IV Program funds maintained in an interest-bearing or investment account?	_____	yes___no___ n/a___
	Exceptions:		
668.163(c)(4)	▸ Up to $250 of the combined interest on all Title IV accounts may be retained by the school for administrative expenses. (*Note: interest earned on Federal Perkins or FFEL is not included in the $250 amount.)*		
668.163(c)(1)	▸ All interest or investment revenue earned on Federal Perkins Loan Program funds maintained in an interest-bearing or investment account becomes part of that Fund.		
668.163(c)(2)	▸ The institution is not required to maintain FFEL funds in an interest-bearing account; however if it chooses to do so, the institution may retain the interest.		
668.165(a)(1)	N. Does the institution notify the student of the amount of Title IV funds the student and/or his/her parent can expect to receive, and how and when those funds will be paid?	_____	yes___no___
668.165(a)(2) 1998-99 FSFA Handbook, p. 3 - 70	O. Does the institution provide written notification to a student or parent, as applicable, that the student's account has been credited with Direct, FFEL, or Federal Perkins Loan funds?	_____	yes___no___
668.165(a)(3)(i)	1. Does the institution provide this notice no earlier than 30 days before and no later than 30 days after crediting the student's account?	_____	yes___no___
668.165(a)(2)(ii)	2. If the institution credits a student's account with FFEL proceeds received through EFT	_____	yes___no___

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Reference	Question	Responsible Office	Response
	or master check, Federal Perkins, or Direct Loan funds, does it notify the student or parent (in case of PLUS) of their right to cancel all or a portion of the loan or loan disbursement?		
668.165(a)(2)(iii)	a. Does the notice inform the student or parent of the procedures and the time frame by which the cancellation request must be received by the school?	_____	yes___no___
668.165(a)(3)(ii)	3. Is the institution aware that notification can be in writing or equivalent electronic means?	_____	yes___no___
	a. If an institution notifies a student or parent electronically, does the institution request the student or parent to confirm the receipt of the notice and maintain a record of that confirmation?	_____	yes___no___
668.164(d) 1998-99 FSFA Handbook, pp. 3 - 63 - 64	P. When crediting a student's account, does the institution have procedures in place to ensure that Title IV program funds are only applied to allowable charges?	_____	yes___no___
668.164(f)	Q. Does the institution refrain from making a payment to a student or crediting the student's account until the student is enrolled for classes for that period?	_____	yes___no___
668.4	R. Does the institution apply the concepts of "payment period" when requesting and disbursing funds for all of the Title IV programs?	_____	yes___no___
668.164	S. Does the institution ensure that Title IV funds are disbursed to students or parents within the time frames established under the cash management rules?	_____	yes___no___
668.164(f)(1)	1. For credit hour, term-based programs that are offered in semesters, trimesters, or quarters: does the institution ensure that funds are disbursed no earlier than 10 days before the first day of classes of the payment period?	_____	yes___no___ n/a___
668.164(f)(2)	2. For credit hour programs that are not offered		

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Reference	Question	Responsible Office	Response
	in semesters, trimesters, or quarters: does the institution ensure that Title IV funds (with the exception of FFEL or Direct Loan proceeds) are delivered no earlier than the later of:		
	▸ 10 days before the first day of classes of the payment period; *OR*	_____	yes___no___ n/a___
	▸ the date that the student completed the credit hours of the previous payment period?	_____	yes___no___ n/a___
668.164(f)(2)(ii)	a. For subsequent disbursements of FFEL and Direct Loan funds, does the institution ensure that loan funds are not disbursed until the *later* of :		
	▸ the calendar midpoint between the first and last scheduled day of classes of the loan period; *OR*	_____	yes___no___ n/a___
	▸ the date that the student has completed half of the academic coursework in the loan period?	_____	yes___no___ n/a___
668.164(f)(2)	3. For clock-hour programs, does the institution ensure that Title IV funds (with the exception of FFEL and Direct Loan proceeds) are delivered no earlier than the *later* of:	_____	yes___no___ n/a___
	▸ 10 days before the first day of classes of the payment period; *OR*	_____	yes___no___ n/a___
668.164(b)(1)	▸ the date that the institution determines that the student completed the clock hours of the previous payment period?	_____	yes___no___ n/a___
668.164(f)(2)(ii)	a. For subsequent disbursements of FFEL and Direct Loan funds, does the institution ensure that loan funds are not disbursed until the *later* of:		
	▸ the calendar midpoint between the first and last scheduled day of classes of the loan period; *OR*	_____	yes___no___ n/a___

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Reference	Question	Responsible Office	Response
	▸ the date that the student has completed half of the clock hours in the loan period?	_____	yes___no___ n/a___
668.164(b)(3)	b. Is the institution aware that a limited number of excused absences may be included when determining if students have completed all of the clock hours of a prior payment period, if the institution has a written policy which addresses excused absences?	_____	yes___no___ n/a___
668.164(f)(3)	T. For a first-year undergraduate student who has not previously borrowed under the FFEL or Direct Loan programs, does the institution ensure that the first installment of the loan is not credited to the student's account, paid directly to the student, or released for endorsement until 30 days after the first day of the student's program of study?	_____	yes___no___
668.164(e) 668.165(b)(4)(iii)	U. If the Title IV funds that are credited to the student's account exceed allowable charges, does the institution pay the excess to the student (or parent, for PLUS) within 14 days of the later of:		
	▸ The date that the balance occurs;	_____	yes___no___ n/a___
	▸ The first day of classes of a payment period or period of enrollment, as applicable; or	_____	yes___no___ n/a___
	▸ The date the students rescinds his or her authorization for the institution to hold the funds?	_____	yes___no___ n/a___
668.165(b)(1)	V. Is the institution aware that it may permit students (or parents, for PLUS) to authorize the institution to perform any of the following services:	_____	yes___no___
	▸ hold Title IV funds on behalf of the student or parent (except if prohibited under the Reimbursement Payment Method);		
	▸ apply Title IV funds to additional charges on the student's account; or		
	▸ disburse Title IV funds via EFT to the		

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Reference	Question	Responsible Office	Response
	student's or parent's bank account?		
668.165(b)(5)(iii)	1. If the institution holds Title IV funds on behalf of students and parents, does it pay students and parents any remaining balance on loan funds by the end of the loan period, and any remaining balance on other Title IV funds by the end of the last payment period of the award year?	_____	yes___no_ _
	W. If the institution offers services requiring the student's or parent's authorization, does the institution:		
668.165(b)(2)(i)	1. Ensure that the authorization is at the student's (or parent's, for PLUS) option?	_____	yes___no___
668.165(b)(1)	2. Use a written authorization statement which must be signed by the student (or parent, for PLUS) before the services authorized in the statement may be performed?	_____	yes___no___
668.165(b)(2)(ii), (iii)	3. Ensure that the authorization statement uses clear and conspicuous language and states that the authorization can be modified or canceled at any time at the student's or parent's request?	_____	yes___no___
668.165(b)(3)	X. Is the institution aware that it may design the authorization to be valid for a student's entire enrollment period?	_____	yes___no___
668.165(b)(1)(ii)	Y. Is the institution aware that it may use current Title IV program funds to pay minor prior year charges if:	_____	yes___no___ n/a___
668.164(d)(2)(ii)	▸ the institution obtains the student's (or parent's in the case of PLUS) authorization to pay the minor prior year charges; and		
668.164(d)(ii)	▸ the prior year charges do not exceed $100, or the payment of these charges does not, or will not, prevent the student from paying his or her current year educational costs?		
668.165(b)(5)	Z. If students are given the option of authorizing the institution to hold Title IV program funds in		

Reference	Question	Responsible Office	Response
	excess of institutional charges, does the institution ensure that:		
668.165(b)(5)(i)	1. The student and the amount of the funds the institution holds for the student are identifiable and maintained in a subsidiary ledger account designated for that purpose?	_____	yes___no___ n/a___
668.165(b)(5)(ii)	2. It maintains in its bank account, at all times, cash in an amount equal to the funds the institution holds for the student?	_____	yes___no___ n/a___
668.166(a)	AA. Does the institution have procedures and safeguards to monitor its cash needs for Title IV program funds to ensure that the institution does not maintain excess cash? *NOTE: The Secretary considers excess cash to be any amount of Title IV program funds that cannot be disbursed to students by the end of the third business day after receipt.*	_____	yes___no___
668.166(b)	1. Is the institution aware of the excess cash tolerances and the procedures set forth to determine the institution's tolerance limit?	_____	yes___no___
668.166(c)	2. Is the institution aware of the consequences for maintaining excess cash balances?	_____	yes___no___
668.166(a)(2)	3. Is the institution aware that funds received under the Just-in-time Payment Method are exempt from the excess cash requirements?	_____	yes___no___

Recommended Good Practices Related to Cash Management

Practice	Comments
1. The institution should ensure that it has sufficient personnel responsible for monitoring its Title IV cash needs to prevent having excess cash on hand.	
2. The institution should document its policies and procedures governing cash management and include such policies in its policies and procedures manual.	

The policies and procedures should be reviewed and updated as needed to reflect the institution's current practices.

3. When constructing authorization statements for cash management purposes, the Department of Education strongly recommends the use of examples to more clearly illustrate the nature of the services authorized in the statement.

4. The school should not make other services contingent on the student's or parent's authorization of services under cash management. For example, the school must not limit parking permits only to students who authorize the school to apply Title IV funds toward institutional charges.

Comments on Cash Management

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N·A·S·F·A·A

Self-Evaluation Guide for Institutional Participation in Title IV and Other Federal Programs

Part 4: Appendices

Appendix A: Document Control

Listed below are recommended resources. Some of these documents might be in the Financial Aid Office, others in the Fiscal Office. Check the response column to indicate if documents applicable to the institution are readily available.

Resource	Available
A. Audit Information	
1. Audits of Institutions of Higher Education and Other Nonprofit Organizations, Circular A-133, OMB; June 24, 1997 [rescinds Circular A-128 and supersedes the prior Circular A-133]	yes___no___n/a___
2. Accounting, Recordkeeping, and Reporting by Postsecondary Educational Institutions for Federally Funded Student Financial Aid [SFA] Programs (The Blue Book), U.S. Department of Education [USDE]; July 1995	yes___no___n/a___
3. Audit Guide, Student Financial Assistance Programs, USDE, Office of Inspector General, Office of Audit; June 1995, updated July 1997	yes___no___n/a___
4. Government Auditing Standards, Comptroller General of the United States, US General Accounting Office; 1994 Revision	yes___no___n/a___
5. Audits of Institutions of States, Local Governments, and Other Nonprofit Organizations, Circular A-133, OMB; March 1990 [supersedes OMB Circular A-110, Attachment F], revised June 24, 1997	yes___no___n/a___
6. OMB Circular A-133 Compliance Supplement; May 1998	yes___no___n/a___
7. Audits of State and Local Governments, Circular A-128, Office of Management and Budget [OMB]; April 1985 (rescinded June 30, 1997)	yes___no___n/a___
B. General Financial Aid Information	
1. Federal Student Financial Aid Handbook USDE, SFA Programs, for relevant years	yes___no___n/a___
2. A Guide to SARs and ISIRs, USDE, SFA Programs, for relevant years	yes___no___n/a___
3. The Counselor's Handbook for Postsecondary Schools, USDE, SFA Programs, for relevant years	yes___no___n/a___
4. The EFC Formula Book, (previously entitled Congressional Methodology, or The Family Contribution Formula), USDE, SFA Programs, for relevant years	yes___no___n/a___
5. Verification Guide for Title IV Programs, USDE, SFA Programs, for relevant years	yes___no___n/a___

Resource	Available
6. EDExpress User's Guide, USDE, SFA Programs for relevant years	yes___no___n/a___
7. Student Financial Aid Guidelines, DHHS, Public Health Service, Health Services Administration Bureau of Health Personnel Development and Service, October, 1993	yes___no___n/a___
C. Program Specific Information	
1. Payee Guide for the Grants Administration and Payment System (GAPS), USDE, Office of the Chief Financial and Chief Information Officer, May 1998	yes___no___n/a___
2. Electronic FISAP User Guide, USDE, SFA Programs; Revised August 1996	yes___no___n/a___
3. Federal Pell Grant Payment Schedules, USDE, SFA Programs, for relevant years	yes___no___n/a___
4. The Pell Grant Formula (Pell Grant Student Aid Index Calculation Book), USDE, SFA Programs, for relevant years	yes___no___n/a___
5. Recipients Guide for the Department of Education Payment Management System, USDE, for relevant years	yes___no___n/a___
6. Direct Loan School Guide, USDE, SFA Programs; for relevant years	yes___no___n/a__
7. Direct Loan Users Guide, USDE, SFA Programs; for relevant years	yes___no___n/a__
8. The Reconciliation Guide for Direct Loans, USDE, SFA Programs; April 1995	yes___no___n/a___
D. NASFAA Information	
1. The NASFAA Encyclopedia of Student Financial Aid, NASFAA; 1984, as updated	yes___no___n/a___
2. Use of Federal Income Tax Return in Need Analysis, updates for relevant years	yes___no___n/a___
3. Scholarships and Fellowships: The Tax Reform Act of 1986, NASFAA Special Report #23; June 1987	yes___no___n/a___
4. Professional Judgment in Eligibility Determination and Resource Analysis, NASFAA Monograph #10; November 1993	yes___no___n/a___
5. Constructing Student Expense Budgets, NASFAA Monograph #9; April 1993 An update of Monographs #3 & #8	yes___no___n/a___
6. Constructing Student Expense Budgets, NASFAA Monograph #8; June 1988	yes___no___n/a___
7. Professional Judgment in Need Analysis, NASFAA Monograph #7; November 1987	yes___no___n/a___
8. Loan Counseling: Requirements and Good Practices, NASFAA Monograph #6; November 1987	yes___no___n/a___

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Resource	Available
9. Stages in the Development of a Financial Counseling and Debt Management Model, NASFAA Monograph #5; July 1984	yes___no___n/a___
10. Standards for the Verification of Information to Determine Financial Aid Eligibility, NASFAA Monograph #4; April 1984	yes___no___n/a___
11. Constructing Student Expense Budgets, NASFAA Monograph #3; February 1984	yes___no___n/a___
12. Standards for the Development of Policy Guidelines for Packaging Need-Based Financial Aid, NASFAA Monograph #2; April 1983	yes___no___n/a___
13. Standard of Satisfactory Academic Progress to Maintain Financial Eligibility - A Self Regulation Initiative, NASFAA Monograph #1; April 1982	yes___no___n/a___

E. Student Financial Assistance Regulations

1. General Provisions and Institutional Eligibility:

a.	Correction to List of Approved "Ability to Benefit" Tests and Passing Scores; Correction Notice; March 7, 1997	yes___no___n/a___
b.	Student Assistance General Provisions; Final Rule; 34 CFR Part 668, November 25, 1997	yes___no___n/a___
c.	Student Assistance General Provisions; Notice; 34 CFR Part 668, September 19, 1997 (required electronic processes)	yes___no___n/a___
d.	Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal SEOG, Federal Pell Grant, Federal Family Education Loan Program, and Ford Federal Direct Loan Program — Cash Management; Final Rule; 34 CFR Part 668, et al.; November 29, 1996	yes___no___n/a___
e.	Institutional Eligibility and Student Assistance General Provision; Final Rule; 34 CFR Part 668, November 29, 1996	yes___no___n/a___
f.	Student Assistance General Provisions; Final Rule; 34 CFR Part 668, November 27, 1996	yes___no___n/a___
g.	Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal SEOG, and Federal Pell Grant; Final Rule; 34 CFR Part 668, et al.; November 27, 1996	yes___no___n/a___
h.	Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal SEOG, Federal Family Education Loan, Ford Federal Direct Loan, and Federal Pell Grant Programs; Final Rule; 34 CFR Part 668, et al.; November 19, 1996	yes___no___n/a___
i.	List of Approved "Ability to Benefit" Tests and Passing Scores; Notice; October 25, 1996	yes___no___n/a___

Resource		Available
j.	Higher Education Act of 1965; Student Financial Assistance Programs; Federal Regulatory Review; Final Rule; 34 CFR Part 668, et al.; December 1, 1995	yes___no___n/a___
k.	Student Assistance General Provisions; Final Rule; 34 CFR Part 668; December 1, 1995	yes___no___n/a___
l.	Student Assistance General Provisions; Final Rule; 34 CFR Part 668; November 29, 1995	yes___no___n/a___
m.	Institutional Eligibility Under the Higher Education Act of 1965, as Amended; 34 CFR Part 600, 667, 668, 674; June 30, 1995	yes___no___n/a___
n.	Nonprocurement Debarment and Suspension and Federal Acquisition Regulation; Debarment, Suspension, and Ineligibility (Ethics); Proposed Rules; 34 CFR Parts 85, 668 and 682; December 20, 1994	yes___no___n/a___
o.	Student Assistance General Provisions; Federal Perkins Loan Program; Federal SEOG Program; Federal Work-Study Program; Federal Family Educational Loan Programs; Federal Pell Grant Program; Final Rule; 34 CFR Part 668, et al.; December 1, 1994	yes___no___n/a___
p.	Student Assistance General Provisions; Final Rule; 34 CFR Part 668; November 29, 1994 (appeals of cohort default rates)	yes___no___n/a___
q.	Student Assistance General Provisions; Final Rule; 34 CFR Part 668; November 29, 1994 (verification)	yes___no___n/a___
r.	Institutional Eligibility; Student Assistance General Provisions; Federal Family Education Loan Program; Final Rule; 34 CFR Part 600, et al; November 29, 1994	yes___no___n/a___
s.	Student Assistance General Provisions; Notice of Revised Effective Date; Revises effective date of April 29, 1994 Interim Final Regulations to July 1, 1994; 34 CFR Part 668; June 30, 1994	yes___no___n/a___
t.	Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal Supplemental Educational Opportunity Grant, Federal Family Education Loan, Federal Direct Student Loan, and Federal Pell Grant Programs; Notice of relief from regulatory provisions; correction; 34 CFR Parts 668, 674, 675, 676, 682, 685, and 690; June 30, 1994 (Corrects April 13, 1994 Notice to include Midwest flood victims)	yes___no___n/a___
u.	Student Assistance General Provisions; Federal Family Education Loan Programs; Federal Pell Grant Program; Interim Final Regulations With Invitation for Comments; 34 CFR Parts 668, 682, 690; April 29, 1994	yes___no___n/a__
v.	Student Assistance General Provisions; Interim Final Regulations With Invitation for Comments; 34 CFR Part 668; April 29, 1994	yes___no___n/a___
w.	Student Assistance General Provisions; Campus Safety; Final Regulations; 34 CFR 668; April 29, 1994	yes___no___n/a___

Resource	Available
x. Student Assistance General Provisions; Final Regulations; 34 CFR 668; April 28, 1994	yes___no___n/a___
y. Student Assistance General Provisions; Federal Perkins Loan, FSEOG, Federal Work Study, Federal Family Education Loan Program, Federal Pell Grants Program; Notice of Relief from Regulatory Provisions; 34 CFR 668, 674, 675, 676, 682, 685, 690; April 13, 1994 (A June 30, 1994 Notice later corrected this Notice to include Midwest flood victims)	yes___no___n/a___
2. Need Analysis:	
a. Federal Pell Grant, Federal Perkins Loan, Federal Work-Study, Federal SEOG, Federal Family Education Loan and William D. Ford Federal Direct Loan Programs; Updates to Tables used in the Need Analysis Methodology for 1999-2000 Award Year; Notice; June 1, 1998	yes___no___n/a___
b. Federal Pell Grant, Federal Perkins Loan, Federal Work-Study, Federal SEOG, Federal Family Education Loan and William D. Ford Federal Direct Loan Programs; Updates to Tables used in the Need Analysis Methodology for 1998-99 Award Year; Notice; May 29, 1997	yes___no___n/a___
c. Federal Pell Grant, Federal Perkins Loan, Federal Work-Study, Federal SEOG, Federal Family Education Loan and William D. Ford Federal Direct Loan Programs; Updates to Tables used in the Need Analysis Methodology for 1997-98 Award Year; Notice; May 31, 1996	yes___no___n/a___
d. Federal Pell Grant Program ; Need Analysis Methodology for 1996-97 Award Year, Revision; Notice; May 31, 1995	yes___no___n/a___
e. Federal Pell Grant, Federal Perkins Loan, Federal Work-Study, Federal Supplemental Educational Opportunity Grant, Federal Stafford Loan, and Federal Direct Student Loan Programs; Revision of Need Analysis Methodology for 1995-96 Award Year; Notice; May 17, 1994	yes___no___n/a___
3. Federal Pell Grant Program	
a. Federal Pell Grant Program; Deadline Dates for receipt of applications, reports, and other documents for the 1999-2000 award year; Notice; June 26, 1998	yes___no___n/a___
b. Federal Pell Grant Program; Update to Deadline Dates for receipt of applications, reports, and other documents for the 1997-98 award year; Notice; correction; August 25, 1997	yes___no___n/a___
c. Federal Pell Grant Program; Deadline Dates for receipt of applications, reports, and other documents for the 1997-98 award year; Notice; June 9, 1997	yes___no___n/a___
d. Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal SEOG, Federal Pell Grant, Federal Family Education Loan Program, and Ford Federal Direct Loan Program — Cash Management; Final Rule; 34 CFR Part 668, et al.; November 29, 1996	yes___no___n/a__

Resource		Available
e.	Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal SEOG, and Federal Pell Grant; Final Rule; 34 CFR Part 668, et al.; November 27, 1996	yes___no___n/a___
f.	Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal Supplemental Educational Opportunity Grant, Federal Family Education Loan, Ford Federal Direct Loan, and Federal Pell Grant Programs; Final Rule; 34 CFR Part 668, et al.; November 19, 1996	yes___no___n/a___
g.	Federal Pell Grant Program; Deadline Dates for receipt of Applications, reports, and other documents for the 1996-97 award year; Notice; September 9, 1996	yes___no___n/a___
h.	Federal Pell Grant Program; Deadline Dates for receipt of Applications, reports, and other documents for the 1995-96 award year; Notice; April 17, 1996	yes___no___n/a___
i.	Higher Education Act of 1965; Student Financial Assistance Programs; Federal Regulatory Review; Final Rule; 34 CFR Part 668, et al.; December 1, 1995	yes___no___n/a___
j.	Student Assistance General Provisions; Federal Perkins Loan Program; Federal Supplemental Educational Opportunity Grant Program; Federal Work-Study Program; Federal Family Educational Loan Programs; Federal Pell Grant Program; Final Rule; 34 CFR Part 668, et al.; December 1, 1994	yes___no___n/a___
k.	Federal Pell Grant Program; Presidential Access Scholarship Program; Final Rule; 34 CFR Parts 690 and 691; November 1, 1994	yes___no___n/a___
l.	Federal Pell Grant Program; Deadline dates for receipt of applications, reports, and other documents for the 1994-95 award year; Notice; August 8, 1994	yes___no___n/a___
m.	Federal Pell Grant Program; Notice; Deadline dates for Department of Education to receive documents from applicants and institutions for 1994-95 Federal Pell Grant Program; 34 CFR 690; August 1, 1994	yes___no___n/a___
n.	Student Assistance General Provisions; Federal Family Education Loan Programs; Federal Pell Grant Program; Interim Final Regulations With Invitation to Comment; 34 CFR Parts 668, 682, 690; April 29, 1994	yes___no___n/a___
o.	Student Assistance General Provisions; Federal Perkins Loan, FSEOG, Federal Work Study, Federal Family Education Loan Program, Federal Pell Grants; Notice of Relief from Regulatory Provisions; 34 CFR 668, 674, 675, 676, 682, 685, 690; April 13, 1994	yes___no___n/a___
p.	Federal Pell Grant Program; Notice; deadline dates for receipt of applications, reports, and other documents for the 1993-94 award year; 34 CFR Part 690; March 23, 1994	yes___no___n/a___
4.	State Student Incentive Grant Program:	
a.	State Student Incentive Grant Program; Final Rule; 34 CFR Part 692; January 28, 1994	yes___no___n/a___

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Resource	Available
5. Campus-based Programs:	
a. Federal Perkins Loan; Notice of availability of the 1997-98 National Direct Student Loan and Federal Perkins Loan Programs Directory of Designated Low-Income Schools; 34 CFR Part 674; January 26, 1998	yes___no___n/a___
b. Federal Work-Study Program; Final Rule, 34 CFR Part 675; November 28, 1997	yes___no___n/a___
c. Federal Perkins Loan Program, Federal Work-Study Programs, and Federal Supplemental Educational Opportunity Grant Program; Final Rule, 34 CFR Part 674, et al.; September 26, 1997	yes___no___n/a___
d. Federal Perkins Loan; Notice of availability of the amendments to the 1996-97 National Direct Student Loan and Federal Perkins Loan Programs Directory of Designated Low-Income Schools; 34 CFR Part 674; July 25, 1997	yes___no___n/a___
e. Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal SEOG, Federal Pell Grant, Federal Family Education Loan Program, and Ford Federal Direct Loan Program — Cash Management; Final Rule; 34 CFR Part 668, et al.; November 29, 1996	yes___no___n/a___
f. Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal SEOG, and Federal Pell Grant; Final Rule; 34 CFR Part 668, et al.; November 27, 1996	yes___no___n/a___
g. Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal Supplemental Educational Opportunity Grant, Federal Family Education Loan, Ford Federal Direct Loan, and Federal Pell Grant Programs; Final Rule; 34 CFR Part 668, et al.; November 19, 1996	yes___no___n/a___
h. Higher Education Act of 1965; Student Financial Assistance Programs; Federal Regulatory Review; Final Rule; 34 CFR Part 668, et al.; December 1, 1995	yes___no___n/a___
i. Institutional Eligibility Under the Higher Education Act of 1965, as Amended; 34 CFR Part 600, 667, 668, 674; June 30, 1995	yes___no___n/a___
j. Student Assistance General Provisions; Federal Perkins Loan Program; Federal Supplemental Educational Opportunity Grant Program; Federal Work-Study Program; Federal Family Educational Loan Programs; Federal Pell Grant Program; Final Rule; 34 CFR Part 668, et al.; December 1, 1994	yes___no___n/a___
k. Federal Perkins Loan Program, Federal Work-Study Programs, and Federal Supplemental Educational Opportunity Grant Program; Final Rule, 34 CFR Part 674, et al.; November 30, 1994	yes___no___n/a___
l. Federal Perkins Loan, Federal Work-Study, Federal Supplemental Educational Opportunity Grant Programs; Notice of Closing Date for Filing the Fiscal Operations Report and Application to Participate; 34 CFR Part 674 et al.; August 23, 1994	yes___no___n/a___

Resource	Available
m. Federal Perkins Loan; Notice of availability of the amendments to the 1993-94 National Direct Student Loan and Federal Perkins Loan Programs Directory of Designated Low-Income Schools; 34 CFR Part 674; August 5, 1994	yes___no___n/a___
n. Student Assistance General Provisions; Federal Perkins Loan, FSEOG, Federal Work Study, Federal Family Education Loan Program, Federal Pell Grants; Notice of Relief from Regulatory Provisions; 34 CFR 668, 674, 675, 676, 682, 685, 690; April 13, 1994	yes___no___n/a___
6. Federal Family Education Loan programs:	
a. Federal Family Education Loan, and William D. Ford Direct Loan Programs; Conforming Regulations; Final Rule; 34 CFR Part 682, et al.; November 28, 1997	yes___no___n/a___
b. Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal SEOG, Federal Pell Grant, Federal Family Education Loan Program, and Ford Federal Direct Loan Program -- Cash Management; Final Rule; 34 CFR Part 668, et al.; November 29, 1996	yes___no___n/a___
c. Federal Family Education Loan Program; Due Diligence Requirements; Final Rule; 34 CFR Part 682; November 27, 1996	yes___no___n/a___
d. Federal Family Education Loan Program; Guaranty Agency -- Conflict of Interest-Final Rule; 34 CFR Part 682; November 27, 1996	yes___no___n/a___
e. Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal Supplemental Educational Opportunity Grant, Federal Family Education Loan, Ford Federal Direct Loan, and Federal Pell Grant Programs; Final Rule; 34 CFR Part 668, et al.; November 19, 1996	yes___no___n/a___
f. Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal Supplemental Educational Opportunity Grant, Federal Family Education Loan, Ford Federal Direct Loan, and Federal Pell Grant Programs; Federal Regulatory Review; Final Rule; 34 CFR Part 668, et al.; December 1, 1995	yes___no___n/a___
g. Federal Family Education Loan Program; Conforming Regulations; Final Rule; 34 CFR Part 682; December 1, 1995	yes___no___n/a___
h. Nonprocurement Debarment and Suspension and Federal Acquisition Regulation; Debarment, Suspension, and Ineligibility (Ethics); Proposed Rules; 34 CFR Parts 85, 668 and 682; December 20, 1994	yes___no___n/a___
i. Student Assistance General Provisions; Federal Perkins Loan Program; Federal Supplemental Educational Opportunity Grant Program; Federal Work-Study Program; Federal Family Educational Loan Programs; Federal Pell Grant Program; Final Rule; 34 CFR Part 668, et al.; December 1, 1994	yes___no___n/a___
j. Federal Family Education Loan Program; Final Rule; 34 CFR 682; November 30, 1994	yes___no___n/a___

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Resource		Available
k.	Institutional Eligibility; Student Assistance General Provisions; Federal Family Education Loan Program; Final Rule; 34 CFR Part 600, et al; November 29, 1994	yes___no___n/a___
l.	Federal Family Education Loan Program, Final Rule; 34 CFR Part 682; November 30, 1994	yes___no___n/a___
m.	Federal Family Education Loan Program, Final Rule; 34 CFR Part 682; November 29, 1994	yes___no___n/a___
n.	Federal Family Education Loan Program, Final Rule; 34 CFR Part 682; November 25, 1994	yes___no___n/a___
o.	Federal Family Education Loan Program, Final Rule; 34 CFR Part 682; June 29, 1994	yes___no___n/a___
p.	Federal Family Education Loan Program, Final Rule; 34 CFR Part 682; June 28, 1994	yes___no___n/a___
q.	Federal Family Education Loan Program, Final Rule; 34 CFR Part 682; June 24, 1994	yes___no___n/a___
r.	Federal Family Education Loan Program, Final Rule; 34 CFR Part 682; June 16, 1994	yes___no___n/a___
s.	Federal Family Education Loan Program, Final Rule; Corrections and technical changes to final regulations issued December 18, 1992; 34 CFR Part 682; May 17, 1994	yes___no___n/a___
t.	Student Assistance General Provisions, Federal Family Education Loan Program, Federal Pell Grant Program; Interim Final Regulations with Invitation for Comments; 34 CFR Parts 668, 682, 690; April 29, 1994	yes___no___n/a___
u.	Federal Family Education Loan Program; Final Regulations; 34 CFR Part 682; April 29, 1994	yes___no___n/a___
v.	Student Assistance General Provisions, Federal Perkins Loan, FSEOG, Federal Work Study, Federal Pell Grant, Federal Family Education Loan Program; Notice of Relief from Regulatory Provisions; 34 CFR Parts 668, 674, 675, 676, 682, 685, 690; April 13, 1994	yes___no___n/a___
w.	Federal Family Education Loan Program; Final Regulations (deletes school closure plan requirement); 34 CFR Part 682; April 11, 1994	yes___no___n/a___
7.	William D. Ford Federal Direct Loan Program (formerly Federal Direct Student Loan Program):	
a.	Federal Family Education Loan, and William D. Ford Direct Loan Programs; Conforming Regulations; Final Rule; 34 CFR Part 682, et al.; November 28, 1997	yes___no___n/a___
b.	William D. Ford Federal Direct Loan Program; Final Rule; 34 CFR 685; July 1, 1997	yes___no___n/a___

Resource		Available
c.	William D. Ford Federal Direct Loan Program; Final Rule; 34 CFR 685; June 3, 1997 (technical correction)	yes___no___n/a___
d.	William D. Ford Federal Direct Loan Program; Final Rule; 34 CFR 685; May 9, 1997 (technical correction)	yes___no___n/a___
e.	Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal SEOG, Federal Pell Grant, Federal Family Education Loan Program, and Ford Federal Direct Loan Program — Cash Management; Final Rule; 34 CFR Part 668, et al.; November 29, 1996	yes___no___n/a___
f.	Student Assistance General Provisions, Federal Perkins Loan, Federal Work-Study, Federal Supplemental Educational Opportunity Grant, Federal Family Education Loan, Ford Federal Direct Loan, and Federal Pell Grant Programs; Final Rule; 34 CFR Part 668, et al.; November 19, 1996	yes___no___n/a___
g.	William D. Ford Federal Direct Loan Program; Notice of processing deadlines to submit loan records and promissory notes; Notice; 34 CFR 685; October 8, 1996	yes___no___n/a___
h.	William D. Ford Federal Direct Loan Program; Final Rule; 34 CFR 685; June 19, 1996	yes___no___n/a___
i.	William D. Ford Federal Direct Loan Program; Final Rule; 34 CFR 685; June 12, 1996	yes___no___n/a___
j.	William D. Ford Federal Direct Loan Program; Final Rule; 34 CFR 685; December 1, 1995 (repayment amendments)	yes___no___n/a__
k.	William D. Ford Federal Direct Loan Program; Final Rule; 34 CFR 685; December 1, 1995 (regulatory review)	yes___no___n/a__
l.	William D. Ford Federal Direct Loan Program; Final Rule; 34 CFR 685; December 1, 1995 (improvements)	yes___no___n/a__
m.	William D. Ford Federal Direct Loan Program; Notice of Solicitation of Applications for 1996-97 Academic Year; December 29, 1994	yes___no___n/a___
n.	William D. Ford Federal Direct Loan Program; Final Rule; 34 CFR Part 685; December 1, 1994	yes___no___n/a___
o.	William D. Ford Federal Direct Loan Program; Final Rule; 34 CFR Part 685; November 30, 1994	yes___no___n/a___
p.	Federal Direct Student Loan Program; Extension of Closing Date; September 2, 1994 (extends 1995-96 application closing date to November 1, 1994)	yes___no___n/a___
q.	Federal Direct Student Loan Program; Final Rule; 34 CFR Part 685; July 1, 1994	yes___no___n/a___
r.	Federal Direct Student Loan Program; Announcement for Criteria for Direct Loan Origination 1995-96; 34 CFR Part 685; April 26, 1994	yes___no___n/a___

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Resource		Available
s.	Federal Direct Student Loan Program; Notice of Standards for Participation and Solicitation of Applications; 34 CFR Part 685; February 17, 1994	yes___no___n/a___
t.	Federal Direct Student Loan Program; Final Rule; 34 CFR Part 685; January 4, 1994	yes___no___n/a___
u.	Federal Direct Student Loan Program; Standards, Criteria, and Procedures for Academic Year Beginning July 1, 1994; 34 CFR Part 685; January 4, 1994	yes___no___n/a___
8.	Health Professions Student Loan (HPSL):	
a.	Low Income Levels for Health Professions and Nursing Programs; Notice 42 CFR Part 57; February 17, 1993	yes___no___n/a___
9.	Health Education Assistance Loan Program (HEAL):	
a.	Health Education Assistance Loan Program; Correction; 42 CFR Part 60; January 21, 1994	yes___no___n/a___
b.	Health Education Assistance Loan Program; Final Rule 42 CFR Part 601; December 21, 1993	yes___no___n/a___
10.	Nursing Student Loan Program:	
a.	Low Income Levels for Health Professions and Nursing Programs; Notice 42 CFR Part 57; February 17, 1993	yes___no___n/a___
11.	National Health Service Corps Scholarship and Loan Repayment Programs:	
a.	National Health Service Corps; Availability of Funds for the National Health Service Corps Loan Repayment Program and Grants for State Loan Repayment Programs; Notice; May 18, 1994	yes___no___n/a___
12.	Program of Financial Assistance for Disadvantaged Health Professions Students (FADHPS) and Exceptional Financial Need Scholarship (EFN):	
a.	Final Definitions. Post-Residency Activities, and Student Agreement for Primary Health Care for the Exceptional Financial Need (EFN) and Financial Assistance for Disadvantaged Health Professions Students (FADHPS) Programs; Notice; 42 CFR Part 57; July 12, 1993	yes___no___n/a___
13.	Scholarships for Disadvantaged Students (SDS):	
a.	Final Funding Preferences for Scholarships for Disadvantaged Students; August 30, 1994	yes___no___n/a___
b.	Program Announcement for Scholarships for Disadvantaged Students; Notice; May 20, 1993	yes___no___n/a___

Resource	Available
14. Other Regulations	
a. Family Educational Rights and Privacy; Final Regulations; 34 CFR Part 99; November 21, 1996	yes___no___n/a___
b. Veterans Education: Implementation of the Veterans' Benefits Act of 1992 and the Department of Defense Authorization Act for Fiscal Year 1993 in the Post-Vietnam Era Veterans' Education; Final Rule; 38 CFR Part 21; February 27, 1996	yes___no___n/a__
c. Veterans Education: Implementation of the Veterans' Benefits Act of 1992, the National Defense Authorization Act for Fiscal Year 1993, and the National Defense Authorization Act for Fiscal Year 1994; Final Rule; 38 CFR Part 21; February 22, 1996	yes___no___n/a__
d. Institutional Eligibility Under the Higher Education Act of 1965, as Amended; 34, CFR Part 600, 667, 668, 674; June 30, 1995	yes___no___n/a__
e. Family Educational Rights and Privacy; Final Regulations; 34 CFR Part 99; January 17, 1995	yes___no___n/a___
f. Nonprocurement Debarment and Suspension and Federal Acquisition Regulation; Debarment, Suspension, and Ineligibility (Ethics); Proposed Rules; 34 CFR Parts 85, 668 and 682; December 20, 1994	yes___no___n/a__
g. Secretary's Procedures and Criteria for Recognition of Accrediting Agencies; State Postsecondary Review Program; Federal Family Education Loan Program; and Endowment Challenge Grant Program; 34 CFR Parts 602, 628, 667, 682; September 7, 1994	yes___no___n/a___
h. Secretary's Procedures and Criteria for Recognition of Accrediting Agencies; 34 CFR Part 602; April 29, 1994	yes___no___n/a___
i. State Postsecondary Review Program; Final Regulations; 34 CFR 667; April 29, 1994	yes___no___n/a___
j. Corporation for National and Community Service; Final Rule; 34 CFR Parts 2510, 2513, et al.; March 23, 1994	yes___no___n/a___
k. Nondiscrimination in Federally Assisted Programs; Title VI of the Civil Rights Act of 1964; Notice; February 23, 1994	yes___no___n/a___
E. Institutional Eligibility and Program Participation Agreements	
1. Letter of Eligibility as an approved/certified institution for administering federal programs (may need separate letters for additional sites/locations)	yes___no___n/a___
2. Program Participation Agreements - Department of Education:	
a. Federal Perkins (National Defense/Direct Student) Loan	yes___no___n/a___
b. Federal Work-Study	yes___no___n/a___

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Resource		Available
c.	Federal Supplemental Educational Opportunity Grant	yes___no___n/a___
d.	Federal Pell Grant	yes___no___n/a___
e.	Federal Stafford Loan/Supplemental Loans for Students/PLUS	yes___no___n/a___
f.	William D. Ford Federal Direct Loan	yes___no___n/a___
3.	Program Participation Agreements - Dept. of Health and Human Services:	
a.	Health Professions Student Loan Program (HPSL)	yes___no___n/a___
b.	Nursing Student Loan Program (NSL)	yes___no___n/a___
c.	Loans for Disadvantaged Students Program (LDS)	yes___no___n/a___
d.	Scholarships for Disadvantaged Students Program (SDS)	yes___no___n/a___
e.	Exceptional Financial Need Scholarship (EFN)	yes___no___n/a___
f.	Financial Assistance for Disadvantaged Health Professions Students (FADHPS)	yes___no___n/a___
g.	Health Education Assistance Loan Program (HEAL)	yes___no___n/a___
4.	Certification Statements Required for Program Participation (ED and HHS)	
a.	Drug-Free Workplace Certification signed by CEO	yes___no___n/a___
b.	Certification of Drug-Free Schools and Campuses	yes___no___n/a___
c.	Certification regarding Non-procurement Debarment and Suspension signed by CEO (for Federal Pell Grant)	yes___no___n/a___
d.	Certification regarding Non-procurement Debarment and Suspension signed by CEO (for Federal Campus-based funds)	yes___no___n/a___
e.	Disclosure of Lobbying Activities	yes___no___n/a___

F. Annual Institutional Applications *(Initial, Supplemental and Deobligation)*

1.	Federal Perkins (NDSL) Loan/Federal Work-Study Program/Federal Supplemental Educational Opportunity Grant Program - FISAP	yes___no___n/a___
2.	Health Professions Student Loan Program (HPSL)	yes___no___n/a___
3.	Nursing Student Loan Program (NSL)	yes___no___n/a___
4.	Exceptional Financial Need Scholarship Program (EFN)	yes___no___n/a___

Resource	**Available**
5. Scholarships for the Undergraduate Education of Professional Nurses Grant Program (for renewal applicants) (SUEPN)	yes___no___n/a___
6. Financial Assistance for Disadvantaged Health Professions Students Program (FADHPS)	yes___no___n/a___
7. Scholarships for Disadvantaged Students Program (SDS)	yes___no___n/a___
8. Loans for Disadvantaged Students Program (LDS)	yes___no___n/a___
9. Other: _____	yes___no___n/a___

G. ED Award Notifications/Allocations/Authorizations

1. Campus-Based Programs Official Notice of Funding	
a. Federal Supplemental Educational Opportunity Grant Program	yes___no___n/a___
b. Federal Perkins Loan/NDSL Program	yes___no___n/a___
c. Federal Work-Study Program	yes___no___n/a___
2. Federal Pell Grant Statement of Account	yes___no___n/a___
3. Federal Pell Grant Administrative Cost Allowance	yes___no___n/a___

H. Annual HHS Authorization Letters *(for applicable programs and supplemental awards)*

1. Health Professions Student Loan Program	yes___no___n/a___
2. Exceptional Financial Need Scholarship Program (EFN)	yes___no___n/a___
3. Financial Assistance for Disadvantaged Health Professions Students Program (FADHPS)	yes___no___n/a___
4. Scholarships for Disadvantaged Students Program (SDS)	yes___no___n/a___
5. Loans for Disadvantaged Student Program (LDS)	yes___no___n/a___
6. Scholarships for the Undergraduate Education of Professional Nurses Grant Program (authorized for funds to renewal applicants only)	yes___no___n/a___
7. Other: _____	yes___no___n/a___

Reports

1. Fiscal Operations Report (part of the FISAP, ED Form 646-1)	yes___no___n/a___

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Resource	Available
2. Campus Based Reallocation Form (ED Form E40-4P)	yes___no___n/a___
3. Reconciliation Reports for Title IV Programs	yes___no___n/a___
4. Federal Pell Grant Institutional Payment Summaries (IPS; ED Form 255-3b)	yes___no___n/a___
5. Federal Pell Grant IPS Batch Report (ED Form 255-3c)	yes___no___n/a___
6. Federal Pell Grant Student Payment Summary (SPS; ED Form 255-4)	yes___no___n/a___
7. Federal Perkins (NDSL) Report of Defaulted Loans (now part of the FISAP)	yes___no___n/a___
8. Documents relating to assignment and/or referral of Federal Perkins (NDSL) Loans (National Direct Student Loan Assignment Form, ED Form 553)	yes___no___n/a___
9. William D. Ford Federal Direct Loan Monthly Reconciliation Report	yes___no___n/a___
10. Health Professions Student Loan Quarterly Reports and Annual Operating Report	yes___no___n/a___
11. Exceptional Financial Need Scholarship Status Report	yes___no___n/a___
12. Nursing Student Loan and Scholarship Quarterly Reports and Annual Operating Report	yes___no___n/a___
13. Copies of the following reports related to the draw down of federal funds:	
a. Request for Advance or Reimbursement (PMS 270)	yes___no___n/a___
b. Automated Clearing House Direct Deposit Sign-up Form (SF-1199A)	yes___no___n/a___
c. Automated Clearing House ACH/EFT Voucher Request Record or FEDWIRE Payment Request Information Voucher or ED Request for Advance or Reimbursement (PMS 270)	yes___no___n/a___
d. Letter of Credit, Treasury Financial Communication System (TFCS) Authorized Signature Card (Standard Form 1194)	yes___no___n/a___
e. TFCS Request for Funds (TFS Form 5805)	yes___no___n/a___
f. Letter of Credit, TFCS (Standard Form 1193A)	yes___no___n/a___
14. ED/PMS and DHHS/PMS Federal Cash Transactions Reports	
Required reports:	
a. Status of Federal Cash (ED/PMS 272)	yes___no___n/a___
b. Federal Cash Transaction Report (ED/PMS 272-A)	yes___no___n/a___
c. Statement of Cash Accountability (ED/PMS 272-B)	yes___no___n/a___

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Resource	**Available**
Optional report:	
d. Error Correction Document (PMS 272-C) *(no longer in use as of March 31, 1993)*	yes___no___n/a___
Informational reports, as needed:	
e. Authorization for Future Periods (PMS 272-F)	yes___no___n/a___
f. Inactive Documents Report (PMS 272-G)	yes___no___n/a___
NOTE: Schools with annual award authorizations totaling $1 million or more may now be required to submit monthly expenditure reports using the Monthly Electronic Expenditure Reporting System (MEERS). MEERS will eventually replace the paper ED/PMS 272 Report.	
15. Other System/Institutional Reports:	
a. Annual report of completion or graduation rates and transfer-out rates, by gender and race with respect to athletically related student aid	yes___no___n/a___
b. Annual report on participation rates, financial support and other information concerning the school's intercollegiate athletic programs	yes___no___n/a___
Other:_____	yes___no___n/a___
I. Audit Reports and Responses *(for Student Financial Aid Programs)*	
1. Copies of federal, state, and independent program review and audit reports and responses (if applicable) on student financial aid programs	yes___no___n/a___
2. Copies of prior student financial aid audits and closure letters	yes___no___n/a___
3. Any additional correspondence relating to follow-up or corrective action taken and any subsequent findings and/or recommendations	yes___no___n/a___
4. Required non-Federal audit reports prepared and submitted to the appropriate Department of Education Regional Inspector General for Audits (RIGA)	yes___no___n/a___
NOTE: These audits are performed in accordance with the financial and compliance elements of the Department of Education's Audit Guide and/or appropriate OMB Circulars.	
a. Copies of audit engagement letters;	yes___no___n/a___
b. Copies of written Representation by Management made to the auditor concerning matters considered to be material to the financial statements	yes___no___n/a___
5. If applicable, copies of annual audit reports issued on the entire institution. The reports can then be available to review any indications of problems relating to both Federal and non-Federal student aid programs	yes___no___n/a___

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Resource	Available
J. Other Reference Documents	
6. Dear Colleague Letters as issued by the Department of Education	yes___no___n/a___
7. Policy Memoranda as issued by the Department of Health and Human Services	yes___no___n/a___
8. Letters of engagement with auditors for your school and for other schools, for comparison of scope of review and fees	yes___no___n/a___
9. Audit Readiness for Recipients of Federal Education Funds. Office of the Inspector General, U.S. Department of Education, April 1985	yes___no___n/a___

K. Additional Applicable Statutes

The institution should also have on file and be in compliance with the following laws, understanding how they impact student financial assistance programs:

1. Discrimination on the Basis of Race, Color or National Origin - Title VI of the Civil Rights Act of 1964. 42 U.S.C. 2000d-2000d-4; 42 CFR Part 80	yes___no___n/a___
2. Discrimination on the Basis of Sex - Title IX of the Education Amendments of 1972, 20 U.S.C. 1681-1683; 45 CFR Part 84	yes___no___n/a___
3. Discrimination on the Basis of Handicap - Sec. 504 of the Rehabilitation Act of 1973. 29 U.S.C. 794; 45 CFR Part 84	yes___no___n/a___
4. Discrimination on the Basis of Age - The Age Discrimination Act. 42 U.S.C. 6101 et seq., 45 CFR Part 90	yes___no___n/a___
5. Discrimination in Lending - Title VII of the Consumer Credit Protection Act, as amended. 15 U.S.C. 1601 et seq., 12 CFR Part 202	yes___no___n/a___
6. Privacy Act of 1974. 20 U.S.C. 1232q; 45 CFR Part 99	yes___no___n/a___
7. Immigration Reform and Control Act of 1986. 8 CFR Part 274a	yes___no___n/a___
8. Tax Reform Act of 1986 (taxation of scholarships and fellowships), Sec. 117 of the Internal Revenue Code	yes___no___n/a___
9. Taxpayer Relief Act of 1997, P.L. 105-34	

APPENDIX B: STUDENT AID LEGISLATION

Public Law 85-864	September 2, 1958 National Defense Education Act of 1958
Public Law 88-452	August 20, 1964 Economic Opportunity Act of 1964
Public Law 89-253	October 9, 1965 Economic Opportunity Amendments of 1965
Public Law 89-287	October 22, 1965 National Vocational Student Loan Insurance Act of 1965
Public Law 89-329	November 8, 1965 Higher Education Act of 1965
Public Law 89-698	October 29, 1966 International Education Amendments of 1966
Public Law 89-752	November 3, 1966 Higher Education Amendments of 1966
Public Law 89-794	November 8, 1966 Economic Opportunity Amendments of 1966
Public Law 90-82	September 6, 1967 To amend the College-Work Study Program with respect to institutional matching and permissible hours at work.
Public Law 90-247	January 2, 1968 Elementary and Secondary Education Amendments of 1967
Public Law 90-460	August 3, 1968 To extend for two years certain programs providing assistance to students at institutions of higher education, to modify such programs, and to provide for planning, evaluation, and adequate lead time in such programs.
Public Law 90-575	October 16, 1968 Higher Education Amendments of 1968
Public Law 91-95	October 22, 1969 Emergency Insured Student Loan Act of 1969
Public Law 91-230	April 13, 1970 To extend programs of assistance for elementary and secondary education, and other purposes.
Public Law 92-157	November 18, 1971 Comprehensive Health Manpower Training Act of 1971

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Public Law 92-158	November 18, 1971 Nurse Training Act of 1971
Public Law 92-318	June 23, 1972 Education Amendments of 1972
Public Law 92-391	August 19, 1972 Joint Resolution
Public Law 93-113	October 1, 1973 Domestic Volunteer Service Act of 1973
Public Law 93-269	April 18, 1974 To make certain appropriations available for obligation and expenditure until June 30, 1975, and for other purposes.
Public Law 93-380	August 21, 1974 Education Amendments of 1974
Public Law 93-579	December 31, 1974 Privacy Act of 1974
Public Law 94-43	June 28, 1975 Emergency Technical Provisions Act
Public Law 94-63	July 29, 1975 Nurse Training Act of 1975
Public Law 94-273	April 21, 1976 Fiscal Year Adjustment Act
Public Law 94-328	June 30, 1976 To amend the Higher Education Act of 1965, and for other purposes.
Public Law 94-482	October 12, 1976 Education Amendments of 1976
Public Law 94-484	October 12, 1976 Health Professions Education Assistance Act of 1976
Public Law 94-503	Crime Control Act (Law Enforcement Education Program)
Public Law 95-43	June 15, 1977 To make certain technical and miscellaneous amendments to provisions relating to higher education contained in the Education Amendments of 1976.
Public Law 95-180	November 15, 1977 To amend the Higher Education Act of 1965 to include the Trust Territory of the Pacific Islands in the definition of the term "state" for the purpose of participation in programs authorized by that Act.

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Public Law 95-336	August 4, 1978 Alcohol and Drug Abuse Education Amendments of 1978
Public Law 95-561	November 1, 1978 Education Amendments of 1978
Public Law 95-566	November 1, 1978 Middle Income Student Assistance Act
Public Law 95-598	November 1, 1978 Uniform Law on the Subject of Bankruptcy
Public Law 96-49	August 13, 1979 Higher Education Technical Amendments of 1979
Public Law 96-56	August 14, 1979 Untitled
Public Law 96-342	September 8, 1980 Department of Defense Authorization Act, 1981
Public Law 96-374	October 3, 1980 Education Amendments of 1980
Public Law 96-536	December 16, 1980 Continuing Appropriations Act of 1980
Public Law 97-12	June 4, 1981 Supplemental Appropriations and Rescissions Act 1981
Public Law 97-35	August 13, 1981 Omnibus Budget Reconciliation Act of 1981
Public Law 97-92	December 15, 1981 Joint Continuing Resolution for FY-82
Public Law 97-161	March 31, 1982 Joint Continuing Resolution for FY-82
Public Law 97-216	July 18, 1982 Urgent Supplemental Appropriation for FY-82
Public Law 97-252	September 8, 1982 Fiscal Year 1983 Defense Department Authorization Act; with an amendment to the Military Selective Service Act
Public Law 97-257	September 10, 1982 Supplemental Appropriations for FY-82
Public Law 97-276	October 2, 1982 Continuing Resolution for FY 83

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Public Law 97-301	October 13, 1982 Student Assistance Technical Amendments of 1982
Public Law 97-320	October 15, 1982 Garn-St. Germain Depository Institutions Act of 1982 (Truth in Lending)
Public Law 97-377	December 21, 1982 Continuing Resolution for FY-83
Public Law 98-8	March 24, 1983 Emergency Appropriations Act
Public Law 98-63	July 29, 1983 FY-83 Supplemental Appropriations Act
Public Law 98-79	August 15, 1983 Student Loan Consolidation and Technical Amendments Act of 1983
Public Law 98-94	September 24, 1983 1984 Defense Department Reauthorization
Public Law 98-139	October 31, 1983 FY-84 Appropriations
Public Law 98-151	November 14, 1983 FY-84 Continuing Resolution
Public Law 98-511	October 19, 1984 Contains Student Aid Technical Amendments of 1984
Public Law 98-558	October, 1984 Omnibus Social Services Bill
Public Law 98-619	November 9, 1984 FY-85 Appropriations
Public Law 99-177	December 12, 1985 Balanced Budget and Emergency Deficit Control Act of 1985
Public Law 99-178	December 12, 1985 FY-86 Education Appropriations
Public Law 99-272	April 7, 1986 Consolidated Omnibus Budget Reconciliation Act of 1985
Public Law 99-498	October 17, 1986 Higher Education Amendments of 1986
Public Law 99-500	October 1, 1986 FY87 Appropriations Continuing Resolution

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Public Law 100-50	June 3, 1987 Higher Education Technical Amendments Act of 1987
Public Law 100-369	July 18, 1988 Untitled
Public Law 100-436	September 20, 1988 Department of Education FY89 Appropriations Act
Public Law 100-647	November 10, 1988 Revenue Act of 1988
Public Law 100-690	November 18, 1988 Omnibus Drug Initiative Act of 1988
Public Law 101-157	November 17, 1989 Fair Labor Standards Amendments of 1989
Public Law 101-166	November 21, 1989 FY90 Appropriations
Public Law 101-239	December 19, 1989 FY90 Budget Reconciliation
Public Law 101-226	December 12, 1989 Drug Free Schools and Communities Act Amendments of 1989
Public Law 101-476	October 30, 1990 Individuals with Disabilities Education Act
Public Law 101-508	November 5, 1990 Omnibus Budget Reconciliation Act of 1990
Public Law 101-517	November, 5 1990 Fiscal Year 1991 Appropriations Act
Public Law 101-527	November 6, 1990 Disadvantaged Minority Health Improvement Act of 1990
Public Law 101-542	November 11, 1990 Student Right-to-Know and Campus Security Act
Public Law 101-589	November 16, 1990 Excellence in Mathematics, Science and Engineering Education Act of 1990
Public Law 101-610	November 16, 1990 National and Community Service Act of 1990
Public Law 101-647	November 29, 1990 Crime Control Act of 1990

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Public Law 102-25	July 25, 1991 Persian Gulf Conflict Supplemental Authorization and Personnel Benefits Act of 1991
Public Law 102-26	April 9, 1991 Higher Education Technical Amendments of 1991
Public Law 102-119	October 7, 1991 Individuals With Disabilities Education Act Amendments of 1991
Public Law 102-164	November 15, 1991 Emergency Unemployment Compensation Act of 1991
Public Law 102-170	November 26, 1991 FY 92 Appropriations Act
Public Law 102-325	July 23, 1992 Higher Education Amendments of 1992
Public Law 102-394	October 6, 1992 Department of Labor, Health and Human Services, and Education, and Related Agencies Appropriations
Public Law 103-66	August 10, 1993 Omnibus Budget Reconciliation Act of 1993
Public Law 103-82	September 21, 1993 National and Community Service Trust Act of 1993
Public Law 103-208	December 20, 1993 Higher Educatiion Technical Amendments Act of 1993
Public Law 103-235	April 28, 1994 Certain Institutions of Higher Education, Exemption from Ineligibility Based on a High Default Rate, Extension
Public Law 103-322	September 13, 1995 Violent Crime Control and Law Enforcement Act of 1994 eliminated Pell Grant Eligibility for certain prisoners
Public Law 104-19	July 27, 1995 Emergency Supplemental Appropriations for Additional Disaster Assistance Act which decreased appropriated funds for FY95 for the Direct Loan Program
Public Law 104-66	December 21, 1995 Federal Reports Elimination and Sunset Act of 1995
Public Law 104-134	April 26, 1996 Fiscal Year 1996 Omnibus Appropriations Act

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Public Law 104-188	August 20, 1996 Small Business Job Protection Act of 1996; GSP Renewal Act of 1996; Employee Commuting Flexibility Act of 1996; and Minimum Wage Increase Act of 1996.
Public Law 104-208	September 30, 1996 Omnibus Consolidated Appropriations Act; Immigration Control and Family Responsibility Act of 1996
Public Law 105-34	August 5, 1997 Taxpayer Relief Act of 1997
Public Law 105-43	September 17, 1997 Need-Based Educational Aid Antitrust Protection Act of 1997
Public Law 105-78	November 13, 1997 FY98 Appropriations for the Departments of Labor, Health and Human Services, and Education, and related agencies for the Fiscal Year ending September 30, 1998

Comments:

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APPENDIX C: HEALTH PROFESSIONS LEGISLATION

Public Law 88-129	September 24, 1963 Health Professions Educational Assistance Act of 1963
Public Law 88-654	October 13, 1964 To amend Title VII of the Public Health Service Act so as to extend to qualified schools of optometry and students of optometry those provisions thereof relating to student loan programs.
Public Law 89-290	October 22, 1965 Health Professions Educational Assistance Amendments of 1965
Public Law 89-709	November 2, 1966 Veterinary Medical Education Act of 1966
Public Law 89-751	November 3, 1966 Allied Health Professions Personnel Training Act of 1966
Public Law 90-490	August 16, 1968 Health Manpower Act of 1968
Public Law 92-52	July 9, 1971 To amend the Public Health Service Act to extend for one year the student loan and scholarship provisions of Titles VII and VIII of such Act.
Public Law 92-157	November 18, 1971 Comprehensive Health Manpower Training Act of 1971
Public Law 92-585	October 27, 1972 Emergency Health Personnel Act Amendments of 1972
Public Law 93-385	August 23, 1974 To amend the Public Health Service Act to extend through fiscal year 1975 the scholarship program for the National Health Service Corps and the loan program for health professions students.
Public Law 94-278	April 22, 1976 Health Research and Health Services Amendments of 1976
Public Law 94-484	October 12, 1976 Health Professions Educational Assistance Act of 1976
Public Law 95-83	August 1, 1977 Health Planning and Health Services Research and Statistics Extension Act of 1977
Public Law 95-215	December 19, 1977 To amend the conditions for schools receiving capitation grants under section 770 of such Act, and for other purposes.
Public Law 95-598	November 6, 1978 To establish a uniform Law on the Subject of Bankruptcies.

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Public Law 95-623	November 9, 1978 Health Services Research, Health Statistics, and Health Care Technology Act of 1978
Public Law 95-626	November 10, 1978 Health Services and Centers Amendments of 1978
Public Law 96-538	December 17, 1980 Health Programs Extension Act of 1980
Public Law 96-221	Amended April 7, 1981 To revise the Truth-in-Lending disclosure requirements for loans made on or after October 1, 1982.
Public Law 97-35	August 31, 1981 Omnibus Reconciliation Act of 1981.
Public Law 99-92	August 16, 1985 The Nurse Education Amendments of 1985.
Public Law 99-129	October 22, 1985 The Health Professions Training Assistance Act.
Public Law 100-607	November 4, 1988 Health Omnibus Programs Extension of 1988
Public Law 101-93	August 16, 1989 Drug Abuse Treatment Technical Corrections Act of 1989
Public Law 101-476	October 30, 1990 Individuals with Disabilities Education Act
Public Law 101-527	November 6, 1990 Disadvantaged Minority Health Improvement Act of 1990
Public Law 102-25	April 6, 1991 Persian Gulf Conflict Supplemental Authorization and Personnel Benefits Act of 1991
Public Law 102-408	October 13, 1992 Health Professions Education Extension Amendments of 1992
Public Law 103-43	June 10, 1993 National Institutions of Health Revitalization Act of 1993
Public Law 103-66	August 10, 1993 Omnibus Budget Reconciliation Act of 1993
Public Law 103-183	December 14, 1993 Preventive Health Amendments of 1993

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APPENDIX C

Public Law 104-299	October 11, 1996 Health Centers Consolidation Act of 1995
Public Law 105-17	June 4, 1997 The Individuals with Disabilities Education Act reauthorization
Public Law 105-20	June 27, 1997 Drug Free Communities Act of 1997

APPENDIX D: NURSE TRAINING LEGISLATION

Public Law 88-581	September 4, 1964 Nurse Training Act of 1964
Public Law 89-290	October 22, 1965 Health Professions Educational Assistance Amendments of 1965
Public Law 89-751	November 3, 1966 Allied Health Professions Personnel Training Act of 1966
Public Law 90-174	December 5, 1967 Partnership for Health Amendments of 1967
Public Law 90-490	August 16, 1968 Health Manpower Act of 1968
Public Law 91-515	October 30, 1970 Heart Disease, Cancer, Stroke, and Kidney Disease Amendments of 1970
Public Law 92-52	July 9, 1971 To amend the Public Health Service Act to extend for one year the student loan and scholarship provisions of Titles VII and VIII of such Act.
Public Law 92-158	November 18, 1971 Nurse Training Act of 1971
Public Law 93-385	August 23, 1974 To amend the Public Health Service Act to extend through fiscal year 1975 the scholarship program for the National Health Service Corps and the loan program for health professions students.
Public Law 94-63	July 29, 1975 Nurse Training Act of 1975
Public Law 94-484	October 12, 1976 Health Professions Educational Assistance Act of 1976
Public Law 95-83	August 1, 1977 Health Planning and Health Services Research and Statistics Extension Act of 1977
Public Law 96-76	September 29, 1979 Nursing Training Amendments of 1979
Public Law 96-221	Amended April 7, 1981 To revise the Truth-in-Lending disclosure requirements for loans made on or after October 1, 1981.
Public Law 97-35	August 31, 1981 The Omnibus Reconciliation Act of 1981.
Public Law 99-92	August 16, 1985 The Nurse Education Amendments of 1985.

APPENDIX D

Public Law 100-607	November 4, 1988 Health Omnibus Programs Extension of 1988
Public Law 101-93	August 16, 1989 Drug Abuse Treatment Technical Corrections Act of 1989
Public Law 102-408	October 13, 1992 Health Professions Education Extension Amendments of 1992
Public Law 103-43	June 10, 1993 National Institutes of Health Revitalization Act of 1993
Public Law 104-299	October 11, 1996 Health Centers Consolidation Act of 1995
Public Law 105-17	June 4, 1997 The Individuals with Disabilities Education Act reauthorization
Public Law 105-20	June 27, 1997 Drug Free Communities Act of 1997

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APPENDIX E: ABBREVIATIONS FREQUENTLY USED IN FINANCIAL AID OFFICES

AAMC	Association of American Medical Colleges
ACA	Administrative Cost Allowance
ACH/EFT	Automated Clearing House/Electronic Funds Transfer
ACT	American College Testing Program
ADC/AFDC	Aid to Dependent Children/Aid to Families with Dependent Children
AFSA	Application for Federal Student Aid prior to 1993-94 (see FAFSA)
AGI	Adjusted Gross Income
AY	Academic Year or Award Year
BHPDS	Bureau of Health Personnel Development and Service
BIA	Bureau of Indian Affairs
CFAR	Comprehensive Financial Aid Report (ACT)
CFR	Code of Federal Regulations
CM	Congressional Methodology (see FM)
COA	Cost of Attendance
CPS	Central Processing System
CSLP	Community Service Learning Program
CSS	College Scholarship Service
CWS or CWSP	College Work-Study Program (see FWS)
DCL	Dear Colleague Letter (USDE)
DEAP	Dependents Educational Assistance Program (VA)
DHHS	Department of Health and Human Services
EASFAA	Eastern Association of Student Financial Aid Administrators
ED	Department of Education
EDE	Electronic Data Exchange
EDPMS	Department of Education Payment Management System (formerly EDPMTS)
EEOC	Equal Employment Opportunity Code
EFC	Expected Family Contribution
EFN	Exceptional Financial Need Scholarship
EFT	Electronic Funds Transfer
ELO	Expanded Lender Option
EOP	Educational Opportunity Program
ESAR	Electronic Student Aid Report
ESL	English as a Second Language
ESOA	Electronic Statement of Account
FA	Financial Aid

FAA	Financial Aid Administrator
FADHPS	Financial Assistance for Disadvantaged Health Professions Students
FAF	Financial Aid Form (CSS)
FAFNAR	Financial Aid Form Need Analysis Report (CSS)
FAFSA	Free Application for Federal Student Aid
FAIR	Financial Aid Institutional Report (USAF)
FAO	Financial Aid Office
FAT	Financial Aid Transcript
FC	Family Contribution
FCC	Federal Capital Contribution
FDSLP	Federal Direct Student Loan Program
FERPA	Family Educational Rights and Privacy Act
FFS	Family Financial Statement (ACT)
FISAP/FISCOP	Fiscal Operations Report and Application for Funds
FISL	Federal Insured Student Loan
FFEL	Federal Family Education Loan Program
FM	Federal Need Analysis Methodology/Federal Methodology
FR	Federal Register
FSEOG	Federal Supplemental Educational Opportunity Grant
FSFA Handbook	Federal Student Financial Aid Handbook (USDE)
FT	Full-time
FTE	Full-time Equivalent
FWS	Federal Work-Study Program (formerly College Work-Study)
FY	Fiscal Year
GAPS	Grants Administration & Payment System
GAPSFAS	Graduate & Professional School Financial Aid Service (ETS)
GAO	Government Accounting Office
GES	General Electronic Support network (USDE)
GPA	Grade Point Average
GSL/GSLP	Guaranteed Student Loan/Program (see FFEL)
HEA	Higher Education Act
HEAF	Higher Education Assistance Foundation
HEAL	Health Education Assistance Loan Program
HHS	Department of Health and Human Services

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HPSL	Health Professions Student Loan
ICC	Institutional Capital Contribution
ICL	Income Contingent Loan
IG	Inspector General
INS	Immigration and Naturalization Service
IPS	Institutional Payment Summary
IQAP	Institutional Quality Assurance Program
IRS	Internal Revenue Service
ISIR	Institutional Student Information Record
JLD	Job Location and Development
JTPA	Job Training Partnership Act
LDS	Loans for Disadvantaged Students
L,S&T	Limitation, Suspension or Termination (of an institution's eligibility to participate in Title IV programs for failure to comply with law or regulation)
MASFAA	Midwest Association of Student Financial Aid Administrators
MDE	Multiple Data Entry Servicer
NACUBO	National Association of College & University Business Officers
NASFAA	National Association of Student Financial Aid Administrators
NCAA	National College Athletic Association
NCS	National Computer Systems
NDSL	National Defense/Direct Student Loan
NEISP	National Early Intervention Scholarship Partnership Program
NHSC	National Health Service Corps
NIH	National Institutes of Health
NPRM	Notice of Proposed Rulemaking
NSL	Nursing Student Loan
NSLDS	National Student Loan Data System
OSFA	Office of Student Financial Assistance
PC	Parental Contribution
PCL	Primary Care Loan
PGI	Pell Grant Index (formerly Student Aid Index)
PGRFMS	Pell Grant Recipient and Financial Management System
PHEAA	Pennsylvania Higher Education Assistance Agency
PL	Public Law
PLUS	Parent Loan

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PPA	Program Participation Agreement
PGRFMS	Pell Grant Recipient and Financial Management System
PT	Part-time
RAD	Renewal Application Destination
RDE	Recipient Data Exchange
RMASFAA	Rocky Mountain Association of Student Financial Aid Administrators
SAI	Student Aid Index (see PGI)
SAR	Student Aid Report
SASFAA	Southern Association of Student Financial Aid Administrators
SC	Student Contribution
SCR	Student Confirmation Report
SDS	Scholarships for Disadvantaged Students
SEOG	Supplemental Educational Opportunity Grant (see FSEOG)
SFA	Student Financial Aid
SFAP	Student Financial Assistance Programs (USDE)
SLMA	Student Loan Marketing Association (Sallie Mae)
SLS	Federal Supplemental Loans for Students
SOA	Statement of Account
SPS	Student Payment Summary
SSCR	Student Status Confirmation Report
SSI	Supplemental Security Income
SSIG	State Student Incentive Grant
SUEPN	Scholarships for the Undergraduate Education of Professional Nurses
SWASFAA	Southwest Association of Student Financial Aid Administrators
TIV WAN	Title IV Wide Area Network
TFC	Total Family Contribution
T/L	Truth-in-Lending
UM	Uniform Methodology (see FM)
USAF	United Student Aid Funds
USDE/USED	United States Department of Education
VA	Veteran's Administration
VEAP	Veterans Educational Assistance Program
WASFAA	Western Association of Student Financial Aid Administrators

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